

R. LEIGH MCPHAIL
V
CHILDNET, INC.

DEPOSITION OF SILVIA SMITH-TORRES

March 13, 2013

CONDENSED TRANSCRIPT AND CONCORDANCE

PREPARED BY:
BRICKELL, GOMBERG & ASSOCIATES, INC.
Suite One
521 South Andrews Avenue
Fort Lauderdale, FL 33301
Phone: 954.522.0067
FAX: 954.522.0114
E-mail: bgsupport@aol.com

<p>1 APPEARANCES: 2 3 WILLIAM R. AMLONG, ESQUIRE 4 AMLONG & AMLONG, P.A. 5 500 NORTHEAST FOURTH STREET 6 FORT LAUDERDALE, FLORIDA 33301 7 ON BEHALF OF THE PLAINTIFF. 8 9 THOMAS H. LOFFREDO, ESQUIRE 10 GRAY ROBINSON 11 401 EAST LAS OLAS BOULEVARD 12 LAS OLAS CITY CENTRE - 401 13 FORT LAUDERDALE, FLORIDA 33301 14 ON BEHALF OF THE DEFENDANT. 15 16 ALSO PRESENT: 17 18 CHRIS SUTTER, IN-HOUSE COUNSEL CHILDNET 19 20 21 22 23 24 25</p>	<p>2 1 EXHIBITS 2 3 DESCRIPTION PAGE 4 Plaintiff's Exhibit 1 26 5 Plaintiff's Exhibit 2 34 6 Plaintiff's Exhibit 3 49 7 Plaintiff's Exhibit 4 50 8 Plaintiff's Exhibit 5 52 9 Plaintiff's Exhibits 6, 7, 8, 9 and 10 53 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>1 INDEX 2 3 EXAMINATIONS PAGE 4 SYLVIA SMITH-TORRES 5 DIRECT EXAMINATION 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>3 1 THEREUPON: 2 THE COURT REPORTER: Raise your right 3 hand, please. 4 Do you swear the testimony you're about 5 to give is the truth, the whole truth, and 6 nothing but the truth, so help you God? 7 THE WITNESS: I do. 8 THEREUPON: 9 SYLVIA SMITH-TORRES, 10 was called as a witness by the Plaintiff and, after having 11 been first duly sworn, was examined and testified as 12 follows: 13 DIRECT EXAMINATION 14 BY MR. AMLONG: 15 Q. Please give us your full name, tell us where you 16 live and what you do for a living. 17 A. Sylvia Smith-Torres, 16009 Northwest 82nd Place, 18 Miami Lakes, Florida 33016. 19 MR. LOFFREDO: He asked what you do for 20 a living. 21 THE WITNESS: I'm sorry. I didn't hear 22 the question. 23 I'm the executive director for Broward 24 at ChildNet. 25 ///</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 BY MR. AMLONG:</p> <p>2 Q. How long have you been executive director?</p> <p>3 A. Since October 1st of last year.</p> <p>4 Q. Tell me what the organizational structure now is</p> <p>5 of ChildNet.</p> <p>6 A. We have an executive director -- we have a CEO,</p> <p>7 who is a Emilio Benitez. We have a COO, who is Dipak</p> <p>8 Parekh. And he's also our CFO. Then we have an executive</p> <p>9 director in Broward and an executive director in Palm</p> <p>10 Beach.</p> <p>11 How far down do you want me to --</p> <p>12 Q. You know --</p> <p>13 A. Then we have five assistant vice presidents.</p> <p>14 Q. Okay.</p> <p>15 A. That are over both Palm Beach and Broward County.</p> <p>16 Q. So an executive director is higher than the</p> <p>17 assistant vice president?</p> <p>18 A. Yes.</p> <p>19 And then under the assistant vice presidents,</p> <p>20 there's directors.</p> <p>21 Q. And before you were executive director, what were</p> <p>22 you?</p> <p>23 A. I was vice president of client services.</p> <p>24 Q. Are there any more vice presidents?</p> <p>25 A. No.</p>	<p>6</p> <p>1 Then from 1980 -- I worked for a short time with</p> <p>2 my parents' company, but I don't remember the dates.</p> <p>3 Maybe it was a couple of years, two, three years. Silmar</p> <p>4 Electronics.</p> <p>5 Then I went to work for Peter Seafoods. I don't</p> <p>6 remember the dates, but I worked with Peter Seafoods.</p> <p>7 Then they had another company, another seafood company</p> <p>8 that I worked with.</p> <p>9 Then the accountants -- Peter Seafood's</p> <p>10 accountants recruited me. So I was a staff accountant. I</p> <p>11 worked on the books. I had several clients of my own</p> <p>12 for -- it was Shultz and Rosenbloom.</p> <p>13 Q. Okay. For how long?</p> <p>14 A. One or two -- you know, I don't recall. One or</p> <p>15 two years.</p> <p>16 Q. Okay.</p> <p>17 A. Then I was employed -- I believe I was recruited</p> <p>18 from Shultz and Rosenbloom to go work -- it was called</p> <p>19 Flora Foods in Pompano -- as a controller.</p> <p>20 Q. Okay.</p> <p>21 A. Then, you know what, I don't recall. Then in</p> <p>22 19 -- I'm sorry. Then I started the Carianne Center. I</p> <p>23 was a founder and the executive director. It was a</p> <p>24 substance and abuse program from women and children.</p> <p>25 Q. Okay. Spell Carianne.</p>
<p>1 You know what? I'm sorry. There is one now.</p> <p>2 Vice president of network development.</p> <p>3 Q. Who's that?</p> <p>4 A. Neiko Shea.</p> <p>5 Q. Take me through your educational and professional</p> <p>6 background, please.</p> <p>7 A. Education, I have a high school degree. I don't</p> <p>8 have a college degree. I worked for -- well, University</p> <p>9 of Miami Child Protection Team as a program administrator</p> <p>10 from 1994 to 2000 -- dates -- then I worked for ChildNet</p> <p>11 from 2002, December 2002, to the present.</p> <p>12 Q. And you graduated from high school where?</p> <p>13 A. Our Lady of Lords Academy.</p> <p>14 Q. When?</p> <p>15 A. 1970.</p> <p>16 (Discussion off the record.)</p> <p>17 BY MR. AMLONG:</p> <p>18 Q. So your date of birth is?</p> <p>19 A. 9/28/52.</p> <p>20 Q. And what did you do between 1970 and 1994?</p> <p>21 A. I worked for -- I wish I had my resumé here. I</p> <p>22 worked for Bill Eisnor Real Estate for about ten years,</p> <p>23 from 1970 to 1980, started as a clerical position. I</p> <p>24 became the office manager for both branches. I became a</p> <p>25 broker. Then I did all the accounting for them.</p>	<p>7</p> <p>1 A. C-A-R-I-A-N-N-E.</p> <p>2 I stayed home for a while for a couple of years,</p> <p>3 then I founded the Carianne Center. In 1988 or '89, I</p> <p>4 started work on it. Well, '88, my daughter Carianne, who</p> <p>5 was my adopted daughter, who was substance exposed at</p> <p>6 birth, so I named the center after her. I worked in</p> <p>7 getting that center together till -- up until about 1992.</p> <p>8 Then I had some medical issues and I didn't go back to</p> <p>9 work until 1994.</p> <p>10 Then from --</p> <p>11 Q. 1994 through 2000, you were at the University of</p> <p>12 Miami Child --</p> <p>13 A. Child Protection Team. I was a program</p> <p>14 administrator.</p> <p>15 Q. What was the -- why did the University of Miami</p> <p>16 have a child protection team?</p> <p>17 A. They subcontracted with the Department of Health</p> <p>18 to provide the services.</p> <p>19 Q. So this is pre-DCF?</p> <p>20 A. No -- there was an investiture. They changed</p> <p>21 from HRS to DCF while I was there.</p> <p>22 Q. But the University of Miami was subcontracting</p> <p>23 from first HRS, then DCF?</p> <p>24 A. Yes -- no. When they split, it was DJJ, DOH and</p> <p>25 HRS was under one umbrella, then they all three split.</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 And the Child Protection Team went under the Department of 2 Health. And we did have contracts with -- I was able to 3 get a contract with DCF in addition to our contract with 4 the Department of Health.</p> <p>5 Q. This is for Dade County?</p> <p>6 A. Yes.</p> <p>7 Q. From 2000 to 2002, you were out of work?</p> <p>8 A. 2000 to 2002 we moved to California for a while 9 for about two years. My husband had been doing -- he's in 10 the seafood business, and he had been doing a lot of 11 business in Mexico. We had four adopted children who were 12 starting to get themselves in a lot of trouble. So we 13 thought maybe our move to California would help them.</p> <p>14 Q. Where in California?</p> <p>15 A. San Diego.</p> <p>16 And then I helped my husband with his business.</p> <p>17 Q. Why did you return to Florida?</p> <p>18 A. Well, I was homesick. Came seven times in two 19 years, because I had left my other -- my biological 20 children had stayed in Florida, and I was very homesick, 21 and my mother was here. And after 9/11, it was like, what 22 the heck are we doing out here, and the kids were getting 23 into even more trouble.</p> <p>24 Q. It's so near Tijuana.</p> <p>25 A. Believe it or not, that's the issue down there is</p>	<p>10 1 identify placement for the children.</p> <p>2 We have -- there, we have -- part of intake and 3 placement is also our court liaison. The next morning, 4 she goes and attends the hearing. And she's been 5 gathering information from the night before for the 6 morning when they staff the cases with the investigator 7 prior to going to shelter hearings.</p> <p>8 There's a lot of things that are happening very 9 quickly once a child is initially removed. We're looking 10 for relatives, nonrelatives, trying to place children with 11 family rather than -- the least restrictive placement.</p> <p>12 Q. Tell me what a shelter hearing is.</p> <p>13 A. A shelter hearing is when a judge hears testimony 14 as to why the -- as to the reasons why it's not safe to 15 keep the kids at home to see if there's probable cause.</p> <p>16 Shelters have to be heard within 24 hours of removal, so 17 we have shelters Saturdays and Sundays.</p> <p>18 Q. What is case management?</p> <p>19 A. Case management entails -- once the children -- 20 there's different aspects of case management. We have 21 voluntary protective supervision, which these are 22 voluntary services.</p> <p>23 We have in-home services with the judicial 24 oversight that we refer to as PADs, petitions for 25 adjudication.</p>
<p>1 the crystal meth.</p> <p>2 Q. Take me through your career with ChildNet, 3 please.</p> <p>4 A. Okay. I started December of 2002 as the director 5 of intake and placement until August of 2005. Then I was 6 promoted to assistant vice president of support services. 7 Then I want to say around -- I don't recall exactly, but 8 it -- March, April, May of 2006, I was promoted to vice 9 president of client services until September 30th of last 10 year.</p> <p>11 Q. Tell me what your job is as vice president of 12 client services.</p> <p>13 A. It entails from intake and placement, case 14 management, permanency and support services.</p> <p>15 How detailed do you want me to be?</p> <p>16 Q. Well, at least tell me what intake and placement 17 is.</p> <p>18 A. When children are initially removed from their 19 parents, they're brought to our intake and placement 20 facility called Safe Place. That's where the children are 21 processed, the intake paperwork is done. We tried to at 22 the time to ameliorate, talk to them, try to stabilize 23 them. We have mental health experts on-site to evaluate 24 them. We do a screening to see if they need to be taken 25 to the hospital, while our intake and placement specialist</p>	<p>11 13 1 And then we have the -- the kids are initially 2 removed from their parents, and we have what we call our 3 reunification units. Our in-home units work with the 4 parents in putting services in the home to ensure the 5 safety and well-being of the children and try to stabilize 6 the home without creating a removal episode. And for the 7 children who have been removed, the case managers work 8 with the parents providing them tasks.</p> <p>9 There's a lot -- there's assessments that are 10 done to determine what tasks the parents need to do to 11 complete and/or to get the children placed back in their 12 home.</p> <p>13 Q. And the first thing you mentioned before the 14 adjudication was what?</p> <p>15 A. Those are in-home cases.</p> <p>16 Q. Oh.</p> <p>17 A. But there are two types of in-home cases; there's 18 voluntary, and there is with judicial oversight. And we 19 also have a family preservation unit now, which works 20 together with the Broward Sheriff's Office, and we monitor 21 the cases that are in prevention and diversion that don't 22 go into case management. The cases that go into case 23 management are higher risk cases.</p> <p>24 Q. And permanency is what?</p> <p>25 A. Permanency entails adoption, our adoption unit.</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 Our TPR unit, which is termination of parental rights 2 unit, independent living, children with extraordinary 3 needs, and our missing persons unit, and our aftercare. 4 Q. Okay. 5 We have an adoption, terminating parental rights. 6 What else? 7 A. Independent living. 8 Q. What's that mean? 9 A. These are -- and it's really our children with a 10 goal of APPLA, another planned permanent living 11 arrangement. I know the acronym. These are -- it's -- to 12 me, it's an oxymoron. It's a goal you don't want to 13 achieve because it's usually children that unfortunately 14 have lingered in the system. The parents are not working 15 on their case plan tasks, and that's the goal that the 16 Court has given them because they're -- some of them may 17 have had the goal of adoption, but the goal has been 18 changed to APPLA, and it looks like these children may or 19 may not age out of foster care. 20 Q. Okay. 21 And the next one is? 22 A. Then we have a missing persons unit who actively 23 looks for our children who are on runaway. 24 Then we have a CEN unit, which is children with 25 extraordinary needs. These are children who have DJJ</p>	<p>14</p> <p>1 A. And that's another unit under support services. 2 Q. And what's the transportation unit do? 3 A. We transport our children to and from medical 4 appointments, visits, court, school. 5 Q. Does ChildNet have a residential facility? 6 A. No. 7 Q. So from where do you transfer the kids to courts 8 visits? 9 A. We contract. We contract. We have providers 10 that provide the foster home maintenance, residential 11 group care, and shelters. We contract that out. 12 Q. You contract out what now? 13 A. For shelter, shelter residential group care. And 14 foster homes, foster home maintenance. We have providers 15 that provide that service. And they're charged for 16 recruitment and retention of our foster parents. 17 Q. Who does the residential group care? 18 A. We have different providers. We have Henderson. 19 Q. Henderson Mental Health? 20 A. Henderson Mental Health. We have ACTS. 21 Q. What is that? 22 A. That's the acronym, ACTS. Agency -- you got me 23 there. I don't recall what it stands for. Agency -- we 24 have Chrysalis. 25 Q. Spell that, please.</p>
<p>1 history; runaway, sexual acting out, aggressive. And it's 2 a unit that the case managers manage eight children on 3 their caseloads as opposed to an average case load of 18 4 to 20. 5 Q. And support services? 6 A. Support services, that entails background 7 screening, background screening of parents, relatives, 8 nonrelatives, foster parents, and pre-adoptive parents. 9 We have diligent search. 10 Q. What does that mean? 11 A. Where we look for missing parents. A diligent 12 search unit, a medical unit, and a transportation unit, 13 and now we now have a records management unit. 14 Q. Background screening, diligent search -- 15 A. Diligent search, medical, transportation, and 16 records management. 17 ICPC and courtesy supervision, interstate compact 18 for the placement of children. Those are children that 19 come from other states and are placed in Broward. So it's 20 called ICPC OTI, which really it's courtesy supervision 21 from children -- either they're Florida children placed in 22 Broward or other state's children placed in Broward. And 23 we have a unit that manages those children, because 24 they're not our primary cases. 25 Q. Okay.</p>	<p>15</p> <p>1 A. C-H-R-Y-S-A-L-I-S. 2 Q. C-H-R-Y? 3 A. C-H-R-Y-S-A-L-I-S, Chrysalis. 4 Q. What is Chrysalis? 5 A. A residential group care provider. They have a 6 shelter, which is Crescent. They have two boys' group 7 homes and one girls' group home. SOS Village. 8 Q. What's the name of that? 9 A. SOS Village. S-O-S. SOS Village. And 10 Children's Harbor. 11 Q. Is ACTS a governmental agency? 12 A. No. 13 Q. How many beds does it have? 14 A. ACTS, I believe they're up to 18 now, because 15 ACTS had a shelter which had nine beds called Asia and 16 Aris had nine beds, but we're consolidating them both into 17 one group home. Both into group homes. 18 Q. How many ChildNet beds are there at Henderson? 19 A. Henderson has 12. 20 Q. And -- 21 A. Excuse me, 18. Because they have Charlie, 22 Henderson, and Freedom. 18. 23 Q. How many beds are at Crescent? 24 A. They're licensed for 18, and I recall we're 25 contracting for 13.</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 Q. What's the difference between Crescent and the 2 two boys' groups home and the one girls' group home? 3 A. Crescent is a shelter for boys. It's supposed to 4 be temporary care. The girls' group home are -- they 5 could be permanent placements as opposed to a shelter. 6 Q. You said there are two boys' group home plus 7 Crescent? 8 A. Yes. 9 Q. And how many beds each of those have? 10 A. Cassias has nine. Monarch -- Monarch, although 11 they're licensed and we contract with them, the children 12 are placed -- because Monarch is a group home for sexually 13 reactive boys. 14 Q. What's that mean? 15 A. They're sexually aggressive. They act out 16 sexually. And we -- not all the boys that are placed in 17 this home are ours. They're placed from other parts of 18 the state also. 19 Q. And how many beds does Monarch have? 20 A. I don't recall off the top of my head. You know 21 what? About six. I want to say six. And there's another 22 one, Apollo. Six. 23 Q. So is there anything characteristic of either 24 Cassias or Apollo? 25 A. They serve the same population. Boys. These are</p>	<p>18</p>	<p>1 base? 2 A. Yes. And component. Yes. It's a therapeutic 3 component. 4 Q. And the girls are all just lumped together? 5 A. The girls are at Asia. And then Crescent also 6 has -- I'm sorry, Chrysalis has a girls' group home called 7 Lilac. 8 Q. And do the girls at Lilac have any particular 9 characteristics? 10 A. More or less the same. A lot of same issues. 11 Substance abuse issues. Some of them have been involved 12 in domestic sex trafficking. This particular provider has 13 done -- is very well trained in working with this 14 population. 15 Q. Is there one girls' group home Lilac or are there 16 more than one? 17 A. For Chrysalis, the one girls' group home. 18 Q. And SOS Village? 19 A. SOS Village, that is a 12 home -- they have 20 currently 12 homes now, and it's mostly for siblings 21 groups. It's more of a house-parent model that I believe 22 their model is four days on, three days off. So it's -- 23 and it's for sibling groups. 24 We also have Brookwood, which is for girls. 25 Q. Plus Children's Harbor?</p>	<p>20</p>
<p>1 boys that are difficult to place in foster homes. They 2 have truant behaviors. They're physically aggressive. 3 They have DJJ histories, and they're very difficult to 4 place in foster homes. 5 Q. Monarch is the only one that is sexually 6 aggressive? 7 A. Yes. Aggressive reactive, yes. 8 Q. I'm sorry? 9 A. Aggressive reactive, yes. 10 Q. Are the kids who are in Crescent largely without 11 any particular pathology? 12 A. For the most part. There's some that may not, 13 but for the most part, they all have some issues; some 14 mental health issues, behavioral issues, substance abuse 15 issues. 16 Q. What determines whether or not a -- and Crescent 17 is all boys, right? 18 A. Yes. 19 Q. So what would determine whether or not a young 20 man would go to Crescent as opposed to Cassias or Apollo? 21 A. Availability of the beds. 22 Q. So Crescent, Cassias, and Apollo all have the 23 same client base? 24 A. Yes, more or less. 25 Q. And Monarch has a sexually aggressive client</p>	<p>19</p>	<p>1 A. Children's Harbor is also a group home for 2 siblings, and they have a maternity group home. Either 3 pregnant teens or parenting teens. 4 Q. Can you tell me, there was one more -- 5 A. Brookwood. Brookwood is for our teen girls also, 6 although some of them may have some of the same behavior, 7 they're not as extreme as the other ones because they tend 8 to more hand-pick the girls that are placed there. So 9 their behaviors are not as extreme as the ones that may be 10 going into Aris or Lilac. 11 Q. Does ChildNet pay per bed per child or how -- 12 A. Yes. For filled bed. 13 Q. I mean, what is the standard price? 14 A. Oh, gosh, it varies from \$60 to just under \$300 15 per day. 16 Q. So is Brookwood towards the lower end of the 17 scale and Monarch towards the higher? 18 A. Yes. Yes. 19 Q. So the price per bed depends on what services 20 they're going to have to provide? 21 A. The individual needs of the child. 22 Q. Who chooses which child goes where? 23 A. We have a director -- a vice president of network 24 development, Neiko Shea. 25 Q. Spell that, please.</p>	<p>21</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 A. N-E-I-K-O. 2 Q. N-E- 3 A. N-E-I-K-O, S-H-E-A. 4 Q. Okay. 5 A. Our assistant vice president of support services, 6 her name is Deena, D-E-E-N-O (sic), Ponto, P-O-N-T-O. 7 They don't have the approval authority, because what we do 8 is when we know there's an availability for a bed, we call 9 the provider. We present the child to them in the sense. 10 We send the documentation as to the history of the child, 11 the needs of the child, so they can make a determination. 12 But for a Cassias, Lilac, Monarch, Aris, it does require 13 their approval. 14 Q. Are these all non-for-profit groups? 15 A. Yes. Although I don't recall if Chrysalis there 16 was -- I heard -- I don't know if they have switched to 17 for-profit, but other than that, they're all 18 non-for-profit. 19 Q. It's Chrysalis? 20 A. Chrysalis, yes. 21 Q. C-H-R-Y-S-T -- 22 A. S-A. 23 Q. S-A? 24 A. L-I-S. 25 Q. Chrysalis?</p>	<p>22 1 services. 2 2 Then we have Dawn Liberta, who is the AVP of case 3 management. And Teresa Kennedy who is the AVP of adoption 4 and youth services for both Broward and Palm Beach. All 5 three of them report to me. 6 Q. Okay. 7 And you joined ChildNet during its first year? 8 A. Yes. I'm employee Number 11. 9 Q. And how did you come to work for ChildNet? 10 A. I was asked to come by Robert Israel, who was my 11 immediate supervisor. He was vice president of client 12 services. 13 Q. And how long did you remain as -- how long did 14 you remain working for Mr. Israel? 15 A. Until he was asked -- I don't know -- I don't 16 know if he was asked to resign or if he was terminated. 17 Q. Do you know why? 18 A. No, I don't know why. 19 Q. Did you hear why? 20 A. There was some inappropriate misconduct. 21 Q. Do you know what it was supposed to be? 22 A. And a lot of rumors about him. He did not get 23 along very well with our CEO. 24 Q. Who was that? 25 A. Peter Balitsaris.</p>
<p>1 A. Right. 2 Q. Chrysalis is I think one of the more expensive 3 places to place children? 4 A. Yes. We refer to those as our "deep end." 5 Q. What's the typical stay of a child in one of 6 these places? 7 A. It depends on whether their parents are working 8 on their case plan tasks. It could be anywhere from 9 30 days to ageing out. It depends on -- 10 Q. Which means turning 18? 11 A. Turning 18. 12 Some of them -- we get a lot of children who are 13 6 to 15, 16, 17 years old, some within a week from turning 14 18, two weeks from turning 18 coming into our system 15 because of their ungovernable behaviors. So there's a lot 16 of different factors. 17 Q. So what did you do now as executive director that 18 you did not do before? 19 A. Attend more events. I'm very much involved with 20 the, you know, the day-to-day operation because I oversee 21 the three assistant vice presidents. 22 Q. The AVPs are for what? 23 A. The assistant vice president -- we have the three 24 assistant vice presidents. One is for support services, 25 Deena Ponto, and she's in charge of intake and support</p>	<p>23 25 1 Q. How so? 2 A. They butt heads a lot. Robert was not very 3 forthcoming with information, but I don't know what the 4 final issue was that prompted him to get terminated. I 5 don't recall. I think it was in 2005 -- I don't recall. 6 Q. How close were you with Mr. Balitsaris? 7 A. I was close to him as professionally. 8 Q. Were you friends? 9 A. Outside of work? No. 10 Q. Did you know that Wayne Black was conducting an 11 investigation? 12 A. Yes. 13 Q. How did you find out about that? 14 A. We had -- we had had some gift cards that had 15 been missing probably for about a year. Gift cards here 16 and there went missing. But this last incident was the 17 supervisor -- in the permanency department for the 18 independent living program had just bought a large amount 19 of gift cards. I can't remember if it was Walmart or 20 Target gift cards. She had put them in the safe, and the 21 next morning they were gone. 22 I immediately -- they notified me. I immediately 23 notified our COO. 24 Q. Who is that? 25 A. Barbara Moss. We informed Leigh and we</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 informed -- when we informed Leigh, Leigh suggested we 2 bring on Wayne Black to do an investigation. Then we 3 went -- Barbara and I went -- I don't recall if Leigh went 4 with us, but I know Barbara and I went to talk to Peter to 5 ask him if he had any problems if we hired Wayne Black to 6 do an investigation. We were hoping we would find out who 7 stole the gift cards. And Peter said absolutely. And 8 that's how Wayne was hired.</p> <p>9 Q. Why did you go to Ms. McPhail?</p> <p>10 A. Because we felt that it was employee issues. 11 They were missing from the safe within the agency. We 12 thought it would have been some internal issues that we 13 had going on.</p> <p>14 Q. So were you and Ms. Moss asking McPhail to 15 investigate this?</p> <p>16 A. I don't recall if we were asking her to 17 investigate it or we brought her in to discuss what was 18 going on, at which time she recommended Wayne Black.</p> <p>19 Q. Well, you went to her because you wanted her to 20 find out what was going on?</p> <p>21 A. Yes. And to inform her of what was going on.</p> <p>22 Q. Let me show you what's being marked as Exhibit 1, 23 which is the executive summary of Mr. Black's 24 investigation, and ask you if you ever seen that before.</p> <p>25 (Plaintiff's Exhibit 1 was marked for</p>	26	<p>1 Q. Why not?</p> <p>2 A. We do Level 2 background screenings.</p> <p>3 Q. What's a Level 2 background screening?</p> <p>4 A. It's -- they look at your -- it's the FBI -- the 5 FCIC, and SCSC, your federal and national -- your Florida 6 and your national criminal backgrounds. And if they have 7 disqualifiers, felony disqualifiers, those results are 8 sent to the Department, and the Department of Children and 9 family issues letters which let the employer know whether 10 they are employable or not. And there's -- those would be 11 your felony charges that would be listed on those. 12 (Discussion off the record.)</p> <p>13 BY MR. AMLONG:</p> <p>14 Q. When did you start doing Level 2 background 15 screenings?</p> <p>16 A. To work at ChildNet, you have to have a Level 2 17 background screen.</p> <p>18 Q. How did Brady Grant and Steve Williams get hired?</p> <p>19 MR. LOFFREDO: Object to form, 20 foundation.</p> <p>21 BY MR. AMLONG:</p> <p>22 Q. Do you know who Brady Grant and Steve Williams 23 got hired?</p> <p>24 A. No, I don't.</p> <p>25 Q. When I say Brady Grant, do you know who I'm</p>	28
<p>1 Identification.)</p> <p>2 THE WITNESS: I don't recall having seen 3 it. I know of the report. I knew of -- that 4 there was a report. I don't recall seeing it 5 because I don't recall having seen either -- 6 the background screening. I knew of the 7 issues of the background --</p> <p>8 BY MR. AMLONG:</p> <p>9 Q. What were the issues of the background screening?</p> <p>10 A. That there were two employees that had some 11 felony charges.</p> <p>12 Q. How did you know that?</p> <p>13 A. Probably in discussions with Barbara Moss or 14 Peter. But I was aware of those after the report came 15 out. I knew of the report. I don't recall if I saw the 16 report.</p> <p>17 Q. What are the law, rules or regulations?</p> <p>18 A. What?</p> <p>19 Q. What are the laws, rules or regulations, if you 20 know, about hiring convicted felons to work in an agency 21 such as ChildNet.</p> <p>22 A. They're not allowed to. Someone with a -- well, 23 can I -- it depends -- let me -- it depends on the felony. 24 But for the most part, we don't hire staff with felony 25 background.</p>	27	<p>1 talking about?</p> <p>2 A. I remember Brady and Steve, yes.</p> <p>3 Q. Now, did Mr. Grant worked for you as assistant 4 facilities coordinator?</p> <p>5 A. Brady?</p> <p>6 Q. Yes.</p> <p>7 A. No.</p> <p>8 Q. What about Mr. Williams?</p> <p>9 A. No. Neither one of them worked for me.</p> <p>10 Q. Do you know for whom they did work?</p> <p>11 A. I believe Brady worked for Steve, who was the 12 facilities manager. And Steve worked for Peter 13 Greenhouse, our CFO.</p> <p>14 Q. So it was Peter Greenhouse, Steve Williams, and 15 then Brady Grant?</p> <p>16 A. Yes.</p> <p>17 Q. Mr. Williams appears, from Mr. Black's report, to 18 have been involved with vehicle repairs.</p> <p>19 Was that part of the transportation function?</p> <p>20 A. Vehicle maintenance, no, not at the time.</p> <p>21 Q. Did it become --</p> <p>22 A. After this incident, it became part of support 23 services. Let me rectify. It had been under support 24 services, then it was taken away from support services and 25 given to facilities. And then after this incident, it</p>	29

SMITH-TORRES SILVIA 03-13-2013

<p>1 went back to -- and it was with support services for a 2 very short time. It went to facilities after the incident 3 and went back to support services.</p> <p>4 Q. When was it under support services?</p> <p>5 A. I don't recall the dates. It was a very short 6 period of time.</p> <p>7 Q. Was either Mr. Williams or Mr. Grant either of 8 your employee?</p> <p>9 A. No.</p> <p>10 Q. When you and Ms. Moss went to see Mr. Balitsaris, 11 had Ms. McPhail already been told to begin an 12 investigation?</p> <p>13 MR. LOFFREDO: Object to the form, 14 foundation. I don't believe she testified</p> <p>15 Ms. McPhail was told to start an 16 investigation.</p> <p>17 BY MR. AMLONG:</p> <p>18 Q. Well, when you and Ms. Moss first went to 19 Mr. Balitsaris, had Ms. McPhail been involved in the 20 inquiry yet?</p> <p>21 A. Yes.</p> <p>22 Q. And take me through this chronology.</p> <p>23 A. You know, I don't recall the chronology.</p> <p>24 Q. Well, somebody comes to you and says: All of our 25 gifts carts are gone?</p>	30	<p>1 investigation Mr. Black was going to undertake?</p> <p>2 A. My understanding was that he was going to look 3 into and question the different persons involved as to why 4 those credit {sic} cards were missing.</p> <p>5 Q. Did you become aware at some point that the 6 investigation had become broader than that?</p> <p>7 A. Sometime during the investigation, we had a 8 laptop that went missing.</p> <p>9 Q. Okay.</p> <p>10 And whose laptop was this and what, if anything, 11 did it contain?</p> <p>12 A. It was the laptop that contained the information 13 for life scanning.</p> <p>14 Q. What is life scanning?</p> <p>15 A. Okay. It is the -- when an individual comes in 16 for electronic fingerprinting, we enter their personal 17 information into the laptop, and then we roll their 18 electronic prints that are submitted to FDLE 19 electronically, and it contained a lot of personal 20 information.</p> <p>21 Q. What -- what --</p> <p>22 A. That fell into the investigation.</p> <p>23 Q. What goes on in that -- you say personal 24 information. Tell me what personal information there is.</p> <p>25 A. Name, address, date of birth, social security,</p>	32
<p>1 A. Are missing. I would have immediately called our 2 COO. Probably not even called. Walked straight to her 3 office and told her what happened. Probably at that time, 4 we either went -- you know, I don't recall. I know we 5 reached out to Leigh because the three of us were 6 together. I do recall the three of us being together in 7 Barbara's office and talking about what was going on, what 8 had happened, and wanting to get to the bottom of it. And 9 then Leigh recommended Wayne.</p> <p>10 Q. What did Ms. McPhail say about Mr. Black?</p> <p>11 A. That she knew someone who was a private 12 investigator that she highly recommended. And I 13 personally quite honestly wanted to get to the bottom of 14 this because this was stealing from the kids, and I was 15 hoping we would be able to find out who was actually 16 stealing them.</p> <p>17 Q. Was Ms. McPhail with you when you went to see 18 Mr. Balitsaris?</p> <p>19 A. I don't remember if she was with us or not. I 20 remember Barbara and I going, but I don't remember if she 21 came with us.</p> <p>22 Q. Do you recall whether or not you and Ms. Moss 23 went back a second time to see Mr. Balitsaris?</p> <p>24 A. I don't recall.</p> <p>25 Q. What did you understand to be the scope of the</p>	31	<p>1 height and weight, aliases. The reason I remember all of 2 this, I just recently filled one out.</p> <p>3 Q. And who was being life scanned?</p> <p>4 A. Parents, relatives, nonrelatives.</p> <p>5 Q. Is this, if your kid is in trouble, you get life 6 scanned?</p> <p>7 A. Prior to placing the children back in the home, 8 we ask the parent to come in for life scanning to run 9 their electronic fingerprints to see if there's any 10 criminal history between the time of the removal to the 11 time we're looking to reunify.</p> <p>12 When we place children with relatives and 13 nonrelatives, we do a complete background screening, 14 foster parents, pre-adoptive parents. And it also life 15 scans employees.</p> <p>16 For parents, relatives, nonrelatives, the 17 information -- the federal information is sent to the 18 Broward Sheriff's Office. They issue us the letters.</p> <p>19 For foster, adoptive and employees, the 20 information goes to the Department of Children and 21 Families.</p> <p>22 Q. And they issue the letters telling you whether or 23 not --</p> <p>24 A. There's a disqualifier.</p> <p>25 Q. Okay.</p>	33

SMITH-TORRES SILVIA 03-13-2013

<p>1 Do you know whether or not any life scanning was 2 ever done concerning Mr. Grant/Washington or Mr. Williams? 3 A. I don't know. 4 Q. Does the no felony rule prohibit -- 5 A. What rule? I'm sorry. 6 Q. You can't hire convicted felon rule, does that 7 prohibit the hiring of people in such positions that were 8 held by Mr. Grant and Mr. Williams? 9 A. Unless it was authorized by someone to hire them 10 or waived their criminal background, I don't see where 11 they can be hired. I would imagine it would have to be 12 waived. 13 Q. Do you know if that's an internal ChildNet rule 14 or that's a law, rule, or regulation? 15 A. I believe -- the Department has -- if someone has 16 a criminal background and they want to be employed, they 17 can go -- can I ask my attorney a question? 18 MR. LOFFREDO: No. If you don't know 19 the answer, you don't know the answer. 20 THE WITNESS: I don't know the answer. 21 (Plaintiff's Exhibit 2 was marked for 22 Identification.) 23 BY MR. AMLONG: 24 Q. Okay. 25 What was your relationship with Mr. Greenhough?</p>	34	<p>1 Q. How did you get along with Ms. McPhail? 2 A. Um, it was challenging. 3 Q. How so? 4 A. Leigh at times had been condescending, 5 disrespectful, rude to me. I remember one particular 6 incident in front my director she was condescending and 7 disrespectful. And I had gone to Barbara Moss, who she 8 supervised, and I told her. And it hadn't been the first 9 time. So I had told Barbara, you know, let me talk to 10 talk her. So I had called her to my office, and I said, 11 you know -- 12 Q. You called Ms. McPhail? 13 A. Yes. 14 And I said, you know, I want to talk to you as a 15 vice president or as a friend. You know, this is not 16 okay. 17 We had a conversation. I thought it was a good 18 conversation. But then the next day, I get a phone call 19 from Ms. Moss telling me that -- not to speak to Leigh and 20 tell her; that Leigh insulted how dare I say that I'm 21 going to talk to her as a friend; she doesn't consider 22 myself a friend. 23 Q. Okay. 24 You said she had been condescending and 25 disrespectful in front of the director. Which director</p>	36
<p>1 A. Other than him being the CFO of the agency, none. 2 Q. No personal relationship? 3 A. No. 4 Q. Did you become aware of allegations made against 5 Mr. Greenhough by the Wayne Black investigation? 6 A. Yes. 7 Q. What were those investigations? What are those 8 allegations? 9 A. As I recall, something to do with an invoice for 10 a wall or something with -- there was some IT issues of 11 the way the inventory was kept and the record of the -- 12 the inventory of the equipment. And there were some -- 13 there were issues with the vehicle maintenance. And 14 that's all I recall. 15 Q. Did the investigation go further than you had 16 intended it to go? 17 A. It did. 18 Q. Do you think it went too far? 19 A. I don't know if I can say -- whether I can say 20 that I felt it did go too far or not. I thought they were 21 looking into credit cards and it just the credit card 22 situation, and it just appeared that it took a life of its 23 own. 24 Q. Did you think this is a good thing or bad thing? 25 A. No, I think it's a good thing.</p>	35	<p>1 was that? 2 A. Michelle Gamelin, our director of intake 3 placement. 4 Q. Gavlin, G-A-V -- 5 A. Gamelin, G-A-M-E-L-I N. 6 We were on a conference call. 7 Q. And how, if at all, was Ms. McPhail condescending 8 and disrespectful? 9 A. What do you mean? Can you ask me again. 10 Q. Well, did you not describe her as being 11 condescending or disrespectful? 12 A. Yes. 13 Q. Tell me what she said or did that was 14 condescending or disrespectful? 15 A. I don't remember exactly the words she used, but 16 it was in her tone and her response to me to statements 17 that I had made. I don't recall the context of the 18 conversation. 19 Q. What was the conversation about? 20 A. I don't recall. 21 Q. When did this conversation occur? 22 A. The date, I don't recall. 23 Q. Was it when Mr. Balitsaris was still there or 24 after Mr. Balitsaris had been let go? 25 A. I don't know. I really don't recall the date. I</p>	37

SMITH-TORRES SILVIA 03-13-2013

<p>1 remember the incident. I remember calling Barbara. I 2 remember talking to Leigh, but I don't recall the context 3 of the conversation.</p> <p>4 Q. Can you remember -- can you give me any examples 5 of behavior or language that Ms. McPhail used that you 6 felt was condescending?</p> <p>7 A. I don't recall the exact words that she used. I 8 would be making it up. I don't recall.</p> <p>9 Q. Okay.</p> <p>10 Can you recall any words that she used that were 11 disrespectful?</p> <p>12 A. Words? I can't recall. All I can tell you is 13 how I felt.</p> <p>14 Q. Was it just this one incidence?</p> <p>15 A. No. Leigh -- we had a lot of complaints from a 16 lot of our directors about Leigh's tone.</p> <p>17 Q. Tell me what they were.</p> <p>18 A. That she was disrespectful. There was complaints 19 about her performance in the sense -- Leigh knew HR law 20 well, very well, but Leigh was not -- was never in the 21 office. I shouldn't say never as a generality, but she 22 missed a lot of days of work. Supposedly worked from 23 home, come in late, would leave early. There was a lot of 24 delays in getting things done. Leigh didn't manage her 25 people well. There was a lot of frustration from the</p>	38	40
<p>1 directors in getting things done from talent management.</p> <p>2 MR. LOFFREDO: For the record, talent 3 management is HR.</p> <p>4 THE WITNESS: I'm sorry, human 5 resources.</p> <p>6 MR. LOFFREDO: It's just called talent 7 management now instead of HR.</p> <p>8 MR. AMLONG: Okay.</p> <p>9 MR. LOFFREDO: I don't think that came 10 up at any prior depositions.</p> <p>11 BY MR. AMLONG:</p> <p>12 Q. Okay.</p> <p>13 She was never in the office and worked from home.</p> <p>14 She was --</p> <p>15 A. Late. She came in late.</p> <p>16 Q. -- not managing her people well.</p> <p>17 A. Not managing the people. Come in late. She 18 would leave early. Her staff was sometimes there; 19 sometimes they were not. Getting things done from HR took 20 days. There was a lot of frustration from staff, 21 complaints.</p> <p>22 Q. Now, is this behavior behavior that occurred 23 before or after Mr. Balitsaris was terminated?</p> <p>24 A. Before and after.</p> <p>25 Q. And how many times are you aware of her working</p>	39	41

SMITH-TORRES SILVIA 03-13-2013

<p>1 A. No. I believe she's also in Hillsborough, but I 2 don't recall what other ones she's in, because there's 3 some little ones up there.</p> <p>4 Q. Okay.</p> <p>5 When was the last time you spoke to her?</p> <p>6 A. Two days ago.</p> <p>7 Q. About what?</p> <p>8 A. About getting her -- getting permission -- 9 telling her that Mr. Loffredo was going to call her.</p> <p>10 Q. Do you have her phone number?</p> <p>11 A. I do.</p> <p>12 Q. Can you give it to me, please.</p> <p>13 A. Sure. (954) 328-4416.</p> <p>14 Q. (954) 328-4416?</p> <p>15 A. Yes.</p> <p>16 Q. Did you discuss anything about Ms. McPhail during 17 that conversation?</p> <p>18 A. I discussed that I was being deposed and that 19 Mr. Loffredo wanted to speak with her.</p> <p>20 Q. What else, if anything, did you say to her?</p> <p>21 A. That's all.</p> <p>22 Oh, regarding Ms. McPhail, correct?</p> <p>23 Q. Yes.</p> <p>24 A. That's all.</p> <p>25 Q. Well, what else did you talk about?</p>	42	<p>1 didn't take --</p> <p>2 Q. Who would say they're not in?</p> <p>3 A. Whoever was in the area when we were looking for 4 somebody in particular.</p> <p>5 Q. Other than what you perceived as a lack of 6 diligent attendance, how else did she not manage her 7 people well?</p> <p>8 A. There was a delay in the response to getting 9 things done when things were asked of HR.</p> <p>10 Q. For example?</p> <p>11 A. If there were corrective actions, if there were 12 terminations, there was a delay in response.</p> <p>13 Q. Give me an example.</p> <p>14 A. There was a -- I believe it was a termination 15 that took probably about two weeks to get it done, two 16 weeks, a little bit over two weeks. And the day it was 17 supposed to get done, Leigh didn't come in.</p> <p>18 Q. Do you remember who the person was?</p> <p>19 A. No.</p> <p>20 Q. Do you know why --</p> <p>21 A. It was done the next day.</p> <p>22 Q. Do you know why Ms. McPhail did not come in that 23 day?</p> <p>24 A. The excuse was because it was raining.</p> <p>25 Q. Is there anything else that you can think of that</p>	44
<p>1 A. Personal things.</p> <p>2 Q. Okay.</p> <p>3 You said that Ms. McPhail did not manage her 4 people well. Give me an example of that, please.</p> <p>5 A. Well, if she wasn't -- her people would come in 6 late, they would leave early.</p> <p>7 Q. Who?</p> <p>8 A. It was Scott, I forgot his last name. Tiffany, I 9 forgot her last name. Crista.</p> <p>10 Q. C-H-R?</p> <p>11 A. C-R-I-S-T-A. Crista Banas, C-R-I-S-T-A 12 B-A-N-A-S.</p> <p>13 Q. Okay.</p> <p>14 A. I don't recall the names of -- of the other 15 people that were there.</p> <p>16 Q. How do you know they would come in late and leave 17 early?</p> <p>18 A. Because we would walk into their areas and they 19 wouldn't be there, and we were told they weren't there 20 yet. And I would have staff complain to me.</p> <p>21 Q. Did you ever witness them not being there?</p> <p>22 A. Yes.</p> <p>23 Q. Do you have any idea what they were doing when 24 they weren't at their desk?</p> <p>25 A. I don't. They would say they're not in. I</p>	43	<p>1 was delayed?</p> <p>2 A. There was a lot of things that were delayed. I 3 just don't -- I could probably sit with my directors and 4 get a list of things, but I -- the people would come in 5 and share their frustration. We would -- we would go to 6 Barbara, express the frustration.</p> <p>7 Q. What would Ms. Moss say?</p> <p>8 A. That she would address them with Leigh.</p> <p>9 Q. Did she ever tell you that she had addressed 10 them?</p> <p>11 A. Yes.</p> <p>12 Q. What did she say that Ms. McPhail had said?</p> <p>13 A. She didn't go into that.</p> <p>14 Q. You said there were lots of frustrations from the 15 staff. What were the frustrations?</p> <p>16 A. The lack of accessibility to HR staff, the delay 17 in response time.</p> <p>18 Q. What else?</p> <p>19 A. The tone and then the manner in which they were 20 addressed.</p> <p>21 Q. Tell me in what tone and manner Ms. McPhail 22 addressed the people.</p> <p>23 A. Some of the complaints were that she was 24 condescending; in other words, trying to make them look 25 like they don't know what they were talking about.</p>	45

SMITH-TORRES SILVIA 03-13-2013

<p>1 Q. Who said that?</p> <p>2 A. Different staff.</p> <p>3 Q. Tell me any of them.</p> <p>4 A. I can't tell you one particular one. I know that</p> <p>5 I had complaints from Lila Cavaso (phonetic) who was the</p> <p>6 director of contracts and licensing. She had complained</p> <p>7 to me about her.</p> <p>8 My directors had complained to me about her.</p> <p>9 Q. What did Ms. Cavaso (phonetic) complain about?</p> <p>10 A. Probably all of the above.</p> <p>11 Q. Well, I mean, I'm not even sure what "all the</p> <p>12 above" is because --</p> <p>13 A. The lack of responsiveness, the condescending</p> <p>14 tone.</p> <p>15 Q. Can you give me any specifics whatsoever?</p> <p>16 A. I can't.</p> <p>17 Q. Did you ever put any of this in writing?</p> <p>18 A. I may have put some things in writing. I had</p> <p>19 conversation was Barbara, or I would direct them to</p> <p>20 Barbara, to go see Barbara.</p> <p>21 Q. Did you ever talk to Mr. Benitez concerning</p> <p>22 Ms. McPhail?</p> <p>23 A. I don't recall having a conversation with</p> <p>24 Mr. Benitez, because Leigh, for the most part, reported to</p> <p>25 Barbara.</p>	<p>46</p> <p>1 Q. And do you recall whether or not the ChildNet</p> <p>2 management team was satisfied with USI?</p> <p>3 A. There were discussions about what I recall that</p> <p>4 they were charging too much money. I don't recall what</p> <p>5 "too much money" is.</p> <p>6 Q. And do you recall who was -- when you say "they,"</p> <p>7 you're talking about USI?</p> <p>8 A. Yes. Their brokerage fee was very high.</p> <p>9 Q. Do you recall who told you that?</p> <p>10 A. In specific, I believe it was just in</p> <p>11 discussions. I don't remember who in specific said it,</p> <p>12 no.</p> <p>13 Q. Did you engage in any group assessment of USI</p> <p>14 versus a broker named Edify?</p> <p>15 A. I don't recall.</p> <p>16 Q. Do you remember an insurance brokerage that was</p> <p>17 being suggested by Joseph Epstein?</p> <p>18 A. I don't recall. I think we went with Site Land</p> <p>19 (phonetic). We're with Site Land (phonetic) right now,</p> <p>20 but -- I don't recall.</p> <p>21 Q. Okay. What was your opinion of Ms. McPhail's</p> <p>22 truth and veracity?</p> <p>23 A. I don't think she told the truth all the time.</p> <p>24 Q. Give me an example.</p> <p>25 A. There was an incident where there was an -- I</p>
<p>1 Q. Are you aware that for a while Ms. McPhail did</p> <p>2 not report to Ms. Moss because she felt that she could not</p> <p>3 do so after having engaged in the Wayne Black</p> <p>4 investigation?</p> <p>5 A. I don't recall.</p> <p>6 Q. Do you recall when there was a review of</p> <p>7 ChildNet's group health insurance?</p> <p>8 A. A review?</p> <p>9 Q. Benefits -- well, do you recall when there was</p> <p>10 some discussion in changing insurance brokerage in 2008?</p> <p>11 A. I recall there was a conversation about the</p> <p>12 possibility of changing. I don't remember if it was</p> <p>13 insurance brokers or insurance companies, because Aetna</p> <p>14 had raised their premiums. They were very high.</p> <p>15 There might have been -- I don't recall exactly</p> <p>16 what the detail -- I know the issues of the high premiums</p> <p>17 and if we were going to go with Humana or -- there was</p> <p>18 another company, another insurance company that they were</p> <p>19 thinking of going with, but because of their record in</p> <p>20 paying claims and the -- Vista, I think it was, whether we</p> <p>21 were going to go with Humana or Vista. I think we opted</p> <p>22 to go in with Humana.</p> <p>23 Q. Do you remember being with United Healthcare</p> <p>24 through a brokerage called USI?</p> <p>25 A. Yes.</p>	<p>47</p> <p>1 Q. Did you ever speak to Ms. McPhail about that?</p> <p>2 A. I don't recall.</p> <p>3 Q. Anything else?</p> <p>4 A. No.</p> <p>5 (Plaintiff's Exhibit 3 was marked for</p> <p>6 Identification.)</p> <p>7 BY MR. AMLONG:</p> <p>8 Q. Let me show you what's being marked as</p> <p>9 Plaintiff's Exhibit 3 and ask you if you recognize that</p> <p>10 document.</p> <p>11 A. I think this is the incident that I just</p> <p>12 described.</p> <p>13 Q. Okay.</p> <p>14 A. And what was your basis for writing to Mr. Rein,</p> <p>15 quote, "Leigh lied again"?</p> <p>16 A. This hadn't been the first incident where I had</p> <p>17 felt that she hadn't been truthful.</p> <p>18 Q. Tell me any other incident.</p>

<p>1 A. I wish I had documented them all.</p> <p>2 Q. Did you document any?</p> <p>3 A. I guess this isn't -- the only one that -- that I</p> <p>4 had documented.</p> <p>5 MR. LOFFREDO: Off the record.</p> <p>6 (Discussion off the record.)</p> <p>7 BY MR. AMLONG:</p> <p>8 Q. Did you have any discussion with -- did you have</p> <p>9 any discussion with Ms. McPhail about the assertion that</p> <p>10 she had lied concerning the approval of the manual?</p> <p>11 A. I believe -- I don't recall. I want you to</p> <p>12 understand something. The magnitude of my</p> <p>13 responsibilities and the things that I have to worry on a</p> <p>14 day-to-day basis about clients, I didn't -- if it's an</p> <p>15 issue, I would bring it up to Barbara, bring it up to</p> <p>16 Larry. At the time, Larry was new to the position, so he</p> <p>17 was beginning to learn some of these things and some of</p> <p>18 the issues that we were having. I didn't have time to be</p> <p>19 documenting everything. It was a lot easier to pick up</p> <p>20 the phone and call and tell Barbara.</p> <p>21 If something came in an e-mail and if I had time</p> <p>22 to do something with it, I would send it. I got -- well,</p> <p>23 you heard my phone ringing. Those are e-mails coming in.</p> <p>24 (Plaintiff's Exhibit 4 was marked for</p> <p>25 Identification.)</p>	<p>50</p> <p>1 A. I don't -- I don't recall today. I may have</p> <p>2 known back then. I don't recall today. I don't recall.</p> <p>3 Q. Let me show you what I'll be marking as</p> <p>4 Plaintiff's Exhibit Number 5.</p> <p>5 (Plaintiff's Exhibit 5 was marked for</p> <p>6 Identification.)</p> <p>7 BY MR. AMLONG:</p> <p>8 Q. And ask you if you recognize that e-mail chain?</p> <p>9 A. Yes.</p> <p>10 Q. And what was the issue here?</p> <p>11 A. We need to do car seat training -- I'm sorry, it</p> <p>12 wasn't car seat training, it was CPR training for our</p> <p>13 child advocate assistants. Those are our equivalent to</p> <p>14 our drivers. And our director of professional development</p> <p>15 didn't have the certificate showing whether they had</p> <p>16 taken -- not only whether they had taken a course, but if</p> <p>17 it was an active, valid -- that they had not expired. She</p> <p>18 didn't have them in her HR files -- I'm sorry in her</p> <p>19 training files so --</p> <p>20 Q. Meaning Ms. Kamin does not have them in her --</p> <p>21 A. In her training files. So she had asked</p> <p>22 permission to look at the HR files, and that she would do</p> <p>23 it herself to see who needed to have the training.</p> <p>24 Q. This is who needed CPR certificates so they could</p> <p>25 take car seat training, correct?</p>	<p>52</p>
<p>1 BY MR. AMLONG:</p> <p>2 Q. Let me show you what's previously been marked as</p> <p>3 Exhibit 4 and ask you if you recognize that e-mail?</p> <p>4 A. Yes. That was just the incident I spoke about</p> <p>5 previously.</p> <p>6 Q. About delay in termination?</p> <p>7 A. Yes.</p> <p>8 Q. Did you discuss with Ms. McPhail why the</p> <p>9 termination was delayed?</p> <p>10 A. I don't recall if I called her directly and had a</p> <p>11 discussion with her or not. I don't recall.</p> <p>12 Q. Do you recall if there were any compliance</p> <p>13 concerns?</p> <p>14 A. Meaning?</p> <p>15 Q. Meaning whether or not the person was being</p> <p>16 terminated in compliance with the Civil Rights Act of</p> <p>17 1964?</p> <p>18 A. Well, she would have been doing the termination,</p> <p>19 so she would have determined that prior to the</p> <p>20 termination.</p> <p>21 Q. But what I'm asking is do you know whether or not</p> <p>22 the delay was because she was investigating that?</p> <p>23 A. Oh, I don't know that.</p> <p>24 Q. Do you have any idea what the reason for the</p> <p>25 delay was, except for the one-day delay because of rain?</p>	<p>51</p> <p>1 A. No. I don't know how this got involved with the</p> <p>2 car seat training. It was really CPR.</p> <p>3 Q. Where were the CPR certificates? Were they in</p> <p>4 the HR file?</p> <p>5 A. They were ultimately found in the HR files.</p> <p>6 Q. How do you know that?</p> <p>7 A. Okay. You see the e-mail from Maxine dated</p> <p>8 May 10th, it says, "Sylvia, if you haven't read my last</p> <p>9 message, we found the backup cards we were looking for in</p> <p>10 the HR files."</p> <p>11 So somehow she got into them. I don't know how.</p> <p>12 Q. So the only thing you knew about this is what</p> <p>13 Ms. Kamin told you?</p> <p>14 A. Yes.</p> <p>15 Q. She said that she found backups, not the</p> <p>16 originals, in the HR files?</p> <p>17 A. That's what the e-mail says, yes. Backup would</p> <p>18 be a picture of the CPR certificate itself.</p> <p>19 Q. Let me show you Exhibit 6, 7, 8, and 9, which</p> <p>20 you're an addressee, and maybe 10 as well, and ask you if</p> <p>21 that refreshes your memory concerning the 2008 evaluation</p> <p>22 of the insurance broker?</p> <p>23 (Plaintiff's Exhibits 6, 7, 8, 9 and 10</p> <p>24 were marked for Identification.)</p> <p>25 THE WITNESS: What was your question?</p>	<p>53</p>

SMITH-TORRES SILVIA 03-13-2013

<p>1 BY MR. AMLONG:</p> <p>2 Q. Does that refresh your memory concerning your 3 involvement in evaluating the insurance brokerage 4 selection for 2008/2009?</p> <p>5 A. Somewhat, but it was ultimately not my decision.</p> <p>6 Q. Do you remember --</p> <p>7 A. Now, I -- you know, I'm reading this, and it's 8 refreshing my mind, yes.</p> <p>9 Q. Do you remember there being a vote of the upper 10 management concerning with which group to go, Edify or 11 USI?</p> <p>12 A. A vote? I don't recall if there was a vote.</p> <p>13 Q. Do you remember Ms. McPhail presenting you with 14 documentation comparing the product being offered through 15 USF and Edify?</p> <p>16 A. It's here so -- it's here, so she did present it, 17 yes.</p> <p>18 Q. Did you ever become aware that Edify was a CPA 19 client of Mr. Epstein's?</p> <p>20 A. I see in the e-mails there's mention of Joey 21 Epstein. I don't recall knowing that he was a CPA client 22 of Mr. Epstein's.</p> <p>23 Q. So Mr. Epstein never told you this?</p> <p>24 A. If he did, I don't recall.</p> <p>25 Q. Mr. Berkowitz never told you this?</p>	<p>54</p> <p>1 answer that. I'm sure I did, but I don't 2 recall what I said or the context of the 3 conversation or...</p> <p>4 BY MR. AMLONG:</p> <p>5 Q. Did you ever ask that Ms. McPhail be terminated?</p> <p>6 A. Ask that she be terminated? I don't recall 7 asking that she be terminated. I'm sure that I shared my 8 frustrations with her department, yes.</p> <p>9 Q. With Mr. Benitez?</p> <p>10 A. I don't recall any specific, but I know I've 11 shared him with Barbara, and I'm sure I shared them with 12 him, but I can't recall when, what date.</p> <p>13 Q. Did Mr. Benitez ever say anything to you about 14 Ms. McPhail?</p> <p>15 A. Now that you're asking the question, there was -- 16 there was -- there's one incident where Ms. McPhail went 17 to some training classes with, I believe it was ADP, and 18 she was very inappropriate, and we got an e-mail 19 complaining about her being late to the training and her 20 inappropriate behavior during the training. And 21 Mr. Benitez was very upset about it.</p> <p>22 Q. From whom did you get the e-mail?</p> <p>23 A. I don't recall. I remember of an e-mail, but I 24 don't recall who the e-mail was from. A statement being 25 made there was an e-mail being sent.</p>
<p>1 A. If he did, I don't recall.</p> <p>2 Q. Well, wouldn't you have wanted to know that 3 before you voted?</p> <p>4 MR. LOFFREDO: Object to form, 5 foundation. She did not testify she even 6 recalled having a vote, and she said it 7 wasn't her decision.</p> <p>8 BY MR. AMLONG:</p> <p>9 Q. Did you discuss Ms. McPhail with Mr. Benitez?</p> <p>10 MR. LOFFREDO: Asked and answered, but 11 go ahead.</p> <p>12 THE WITNESS: What do you mean? I don't 13 understand the question.</p> <p>14 BY MR. AMLONG:</p> <p>15 Q. Well, did you ever complain to Mr. Benitez about 16 Ms. McPhail?</p> <p>17 MR. LOFFREDO: Objection, asked and 18 answered.</p> <p>19 Go ahead.</p> <p>20 THE WITNESS: What do you mean? Excuse 21 me.</p> <p>22 MR. LOFFREDO: I'm just making an 23 objection for the record. You can ahead and 24 answer his question.</p> <p>25 THE WITNESS: I don't even know how to</p>	<p>55</p> <p>1 Q. What did Mr. Benitez say?</p> <p>2 A. He was very frustrated with her behavior.</p> <p>3 Q. Well, that's not my question. My question is, 4 what did he say?</p> <p>5 A. I don't recall.</p> <p>6 Q. Did Mr. Benitez ever consult with you as to 7 whether or not Ms. McPhail should be terminated?</p> <p>8 A. I don't recall.</p> <p>9 Q. Tell me what your involvement was in the ADP 10 controversy.</p> <p>11 A. Involvement?</p> <p>12 MR. LOFFREDO: Object to the form, and 13 characterization.</p> <p>14 BY MR. AMLONG:</p> <p>15 Q. Well, you said Mr. Benitez expressed, in your 16 presence, his concern about an e-mail that had been 17 received from ADP.</p> <p>18 Was it -- what were you participating in a 19 meeting about ADP?</p> <p>20 A. I don't remember. We were in a meeting about ADP 21 when he expressed his frustrations or somebody got the 22 e-mail and brought it to his attention. I remember his 23 frustrations.</p> <p>24 Q. From whom was the e-mail?</p> <p>25 A. I don't recall. I know there was an e-mail</p>

1 communication. You know, I think there was -- could have
 2 been a phone call. I think it was an e-mail.
 3 Q. Okay.
 4 Was this meeting about ADP?
 5 A. I don't think -- I don't think necessarily about
 6 ADP.
 7 Q. Do you recall any discussion about whether or
 8 not -- or about what the relationship should be between
 9 ChildNet and ADP?
 10 A. We were trying to -- we had i-Vantage. Our
 11 payroll system is called i-Vantage. Staff did not like
 12 i-Vantage because it was very cumbersome, the performance
 13 appraisals were very lengthy, very repetitive, very time
 14 consuming to complete. So we been looking at going with a
 15 different payroll company with -- and then ADP was
 16 suggested. I don't know -- I don't recall who suggested
 17 ADP -- that would be able to do the same functions and not
 18 be as cumbersome.
 19 There were discussions that I remember that Leigh
 20 had that ADP might be more expensive than UltiPro, that's
 21 the one we have now, than i-Vantage. I don't remember
 22 what the difference was. If everything got rolled out, if
 23 all the modules that ADP had would get rolled out, we
 24 never rolled them out. I think we only kept the payroll
 25 processing of it, and we kept i-Vantage. We kept both of

58

60

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA)
 3 COUNTY OF BROWARD)
 4
 5 I, Rhonda Bonner, Registered Professional
 6 Reporter, Florida Professional Reporter, Notary Public,
 7 State of Florida, certify that SYLVIA SMITH-TORRES
 8 personally appeared before me on March 13, 2013 and was
 9 duly sworn.

10 WITNESS my hand and official seal this 29th of
 11 March, 2013.

12

13

14

15

RHONDA BONNER
 REGISTERED PROFESSIONAL REPORTER
 NOTARY PUBLIC - STATE OF FLORIDA
 MY COMMISSION #DD806306
 MY COMMISSION EXPIRES 10-15-16

16

17

18

19

20

21

22

23

24

25

59
 1 them. And now we have subsequently moved to a different
 2 payroll system.
 3 Q. So did you eliminate anything or simply add ADP?
 4 A. Added ADP. I don't think anything else was
 5 eliminated.
 6 MR. AMLONG: Thank you.
 7 MR. LOFFREDO: She'll read. I don't
 8 have any questions. Okay.
 9 (Proceedings concluded @ 3:50 p.m. on
 10 March 13, 2013.)

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

61

1 REPORTER'S DEPOSITION CERTIFICATE
 2 STATE OF FLORIDA)
 3 COUNTY OF BROWARD)
 4
 5 I, RHONDA BONNER, Registered Professional
 6 Reporter, Florida Professional Reporter, certify that I
 7 was authorized to and did stenographically report the
 8 deposition of SYLVIA SMITH-TORRES; that a review of the
 9 transcript was requested; and that the foregoing
 10 transcript, pages 1 through 60, is a true and complete
 11 record of my stenographic notes.

12

13

14

I further certify that I am not a relative,
 15 employee, attorney, or counsel of any of the parties, nor
 16 am I a relative or employee of any of the parties'
 17 attorney or counsel connected with the action, nor am I
 18 financially interested in the action.

19

20

21

22

23

24

25

Dated this 29th of March, 2013.

RHONDA BONNER
 REGISTERED PROFESSIONAL REPORTER
 FLORIDA PROFESSIONAL REPORTER

SMITH-TORRES SILVIA 03-13-2013

1
2 March 29, 2013
3
4 SYLVIA SMITH-TORRES
5 c/o THOMAS H. LOFFREDO, ESQUIRE
6 GRAY ROBINSON
7 401 EAST LAS OLAS BOULEVARD
8 LAS OLAS CITY CENTRE • 401
9 FORT LAUDERDALE, FLORIDA 33301
Re: R. LEIGH MCPHAIL v CHILDNET, INC., a Florida
not-for-profit corporation.

10 Please take notice that on March 13, 2013, you
11 gave your deposition in the above-referenced matter. At
that time you did not waive your signature.

12 Please contact our office to make an appointment
13 to read and sign the deposition. Notice that this address
14 may be different than the one where you gave your
15 deposition. If you do not appear to read and sign your
deposition in a reasonable time, the original will be
forwarded to the attorney who requested your appearance
for the deposition for filing with the Clerk of the Court.

If you wish to waive your signature, sign your name in the blank at the bottom of this page and return it to us.

Very truly yours,
19 BRICKELL, GOMBERG & ASSOCIATES
20

I DO HEREBY WAIVE MY SIGNATURE:

23 SYLVIA SMITH-TORRES

24 CC via transcript:
25 WILLIAM R. AMLONG, ESQUIRE, ESQUIRE
THOMAS H. LOFFERDO, ESQUIRE

62

1 **ERRATA SHEET**

2 **F.R.C.P. RULE 1.310 PROVIDES IN PART:**

3 (b) "...Any changes in form or substance that the

4 witness wants to make shall be entered upon a separate

5 correction page by the officer with a statement of the

6 reasons given by the witness for making them..."

PAGE/LINE	CHANGE/CORRECTION	REASON
-----------	-------------------	--------

6
7 _____

8	_____
9	_____
10	_____
11	_____
12	_____
13	_____
14	_____
15	_____
16	_____
17	_____

63

\$	1980 7:23 8:1	30 23:9	9 4:9
\$300 21:14	1988 9:3	30th 11:9	53:19, 23
\$60 21:14	1992 9:7	328-4416	9/11 10:21
_____	1994 7:10, 20	42:13, 14	9/28/52 7:19
_____	9:9, 11	33016 5:18	954 42:13, 14
@ 59:9	1st 6:3	33301 2:4, 9	_____
_____	2	62:7	A
0	2	34 4:5	able 10:2
08-60736 1:3	2 4:5	_____	31:15 58:17
_____	28:2, 3, 14, 16	4	above-
1	34:21	4 4:7 50:24	referenced
1 4:4	20 15:4	51:3	62:11
26:22, 25	2000 7:10	401 2:8 62:6	absolutely
61:11	9:11 10:7, 8	49 4:6	26:7
1.310 63:2	2002 7:11	_____	abuse 8:24
1:33 1:16	10:7, 8 11:4	5	19:14 20:11
10 4:9	2005 11:5	5 3:5 4:8	Academy 7:13
53:20, 23	25:5	52:4, 5	accessibility
10-15-16	2006 11:8	50 4:7	45:16
60:17	2008 47:10	500 1:15 2:3	accountant
10th 53:8	53:21	52 4:8	8:10
11 24:8	2008/2009	53 4:9	accountants
12 17:19	54:4	_____	8:9, 10
20:19, 20	2013 1:16	6	accounting
13 1:16 17:25	59:10	6 4:9 23:13	7:25
59:10 60:8	60:8, 11	53:19, 23	achieve 14:13
62:10 63:22	61:20	60 61:11	acronym 14:11
15 23:13	62:2, 10	_____	16:22
16 23:13	63:22	7	act 18:15
16009 5:17	24 12:16	7 4:9	51:16
17 23:13	26 4:4	53:19, 23	acting 15:1
18 15:3	29 62:2	_____	action
17:14, 21, 22,	29th 60:10	8 4:9	61:17, 18
24	61:20	53:19, 23	actions 44:11
23:10, 11, 14	_____	82nd 5:17	active 52:17
19 8:22	3 4:6	88 9:4	actively
1964 51:17	49:12, 16	89 9:3	14:22
1970	3:50 59:9	_____	ACTS 16:20, 22
7:15, 20, 23		9	17:11, 14, 15

actually	17:11 26:11	56:13 59:3,4	assertion
31:15	27:20 35:1		50:9
add 59:3	41:17		assessment
Added 59:4	aggressive	Apollo	48:13
addition 10:3	15:1 18:15	18:22,24	assessments
additions	19:2,6,7,9,2	19:20,22	13:9
63:22	5	appear 62:14	
address 32:25	ago 42:6	appearance	assistant
45:8 62:13	ahead	62:15	6:13,17,19
addressed	55:11,19,23	APPEARANCES	11:6 22:5
45:9,20,22	aliases 33:1	2:1	23:21,23,24
addressee	allegations	appeared	29:3
53:20	35:4,8	35:22 60:8	assistants
adjudication	allowed 27:22	appears 29:17	52:13
12:25 13:14	already 30:11	APPLA	ASSOCIATES
administrator	am	14:10,18	62:19
7:9 9:14	61:14,16,17	appointment	Attend 23:19
adopted 9:5	ameliorate	62:12	attendance
10:11	11:22	appointments	44:6
adoption	Amlong 1:14	16:4	attends 12:4
13:25	2:2,3 5:14	appraisals	attention
14:5,17 24:3	6:1 7:17	58:13	57:22
adoptive	27:8	apprised	attorney
33:19	28:13,21	40:16	34:17
ADP 56:17	30:17 34:23	approval	61:15,17
57:9,17,19,2	39:8,11	22:7,13	62:15
0	49:14 50:7	50:10	August 11:5
58:4,6,9,15,	51:1 52:7	approved	authority
17,20,23	54:1 55:8,14	40:10,11	22:7
59:3,4	56:4 57:14	April 11:8	authorized
advocate	59:6 62:25	area 44:3	34:9 61:8
52:13	amount 25:18	areas 41:20	availability
Aetna 47:13	and/or 13:11	43:18	19:21 22:8
aftercare	answer	Aris 17:16	average 15:3
14:3	34:19,20	21:10 22:12	AVP 24:2,3
against 35:4	55:24 56:1	arrangement	AVPs 23:22
age 14:19	answered	14:11	aware 27:14
ageing 23:9	55:10,18	Asia 17:15	32:5 35:4
agency	anything	20:5	39:25 47:1
16:22,23	18:23 32:10	aspects 12:20	54:18
	42:16,20		away 29:24
	44:25 49:10		

<hr/> B background 7:6 15:6,7,14 27:6,7,9,25 28:2,3,14,17 33:13 34:10,16 backgrounds 28:6 backup 53:9,17 backups 53:15 bad 35:24 Balitsaris 24:25 25:6 30:10,19 31:18,23 37:23,24 39:23 Banas 43:11 B-A-N-A-S 43:12 Barbara 25:25 26:3,4 27:13 31:20 36:7,9 38:1 40:7,8,13 45:6 46:19,20,25 50:15,20 56:11 Barbara's 31:7 base 19:23 20:1 basis 49:21 50:14 Beach 6:10,15 24:4 became 7:24	 29:22 become 29:21 32:5,6 35:4 54:18 bed 21:11,12,19 22:8 beds 17:13,15,16, 18,23 18:9,19 19:21 begin 30:11 beginning 50:17 BEHALF 2:4,9 behavior 21:6 38:5 39:22 56:20 57:2 behavioral 19:14 behaviors 19:2 21:9 23:15 believe 8:17 10:25 17:14 20:21 29:11 30:14 34:15 41:6 42:1 44:14 48:10 49:1 50:11 56:17 Benefits 47:9 Benitez 6:7 46:21,24 55:9,15 56:9,13,21 57:1,6,15 Berkowitz 54:25 Bill 7:22 biological	 10:19 birth 7:18 9:6 32:25 bit 40:2,3 44:16 Black 25:10 26:2,5,18 31:10 32:1 35:5 47:3 Black's 26:23 29:17 blank 62:17 Bonner 1:22 60:5,15 61:6,23 books 8:11 boss 40:5 bottom 31:8,13 62:17 bought 25:18 BOULEVARD 2:8 62:6 boys 17:6 18:2,3,6,13, 16,25 19:1,17 Brady 28:18,22,25 29:2,5,11,15 branches 7:24 BRICKELL 62:19 bring 26:2 40:15 50:15 broader 32:6 broker 7:25 48:14 53:22 brokerage 47:10,24	 48:8,16 54:3 brokers 47:13 Brookwood 20:24 21:5,16 brought 11:19 26:17 57:22 Broward 1:2 5:23 6:9,15 13:20 15:19,22 24:4 33:18 41:19 60:3 61:3 bundle 41:24 business 10:10,11,16 butt 25:2 <hr/> C c/o 62:4 California 10:8,13,14 car 52:11,12,25 53:2 card 35:21 cards 25:14,15,19, 20 26:7 32:4 35:21 53:9 care 14:19 16:11,13,17 17:5 18:4 career 11:2 Carianne 8:22,25 9:3,4 C-A-R-I-A-N- N-E 9:1 carts 30:25
---	--	--	---

case 1:3 11:13 12:18,19,20 13:7,22 14:15 15:2,3 23:8 24:2 41:15,20,21	63:5 changed 9:20 14:18 changes 63:2 changing 47:10,12	14:2,9,13,18 ,23,24,25 15:2,18,21,2 2,23 16:3 18:11 23:3,12 28:8 33:7,12,20	54:19,21 clients 8:11 50:14 close 25:6,7 CMO 41:15 college 7:8 comes 30:24 32:15 coming 23:14 40:20 50:23
caseloads 15:3	characteristi c 18:23	Children's 17:10 20:25 21:1	COMMISSION 60:16,17
cases 12:6 13:15,17,21, 22,23 15:24	characteristi cs 20:9	chooses 21:22 C-H-R 43:10 CHRIS 2:13 chronology 30:22,23	communication 58:1
Cassias 18:10,24 19:20,22 22:12	characterizat ion 57:13	C-H-R-Y 17:2 Chrysalis 16:24 17:3,4 20:6,17 22:15,20,25 23:2	community- based-care 41:16
cause 12:15	charges 27:11	C-H-R-Y-S-A- L-I-S 17:1,3	compact 15:17
Cavaso 46:5,9	28:11	C-H-R-Y-S-T 22:21	companies 47:13
CC 62:24	charging 48:4	Chrystalis 22:19	company 8:2,7 47:18 58:15
CEN 14:24	Charlie 17:21	CIRCUIT 1:1	comparing 54:14
center 8:22 9:3,6,7	child 7:9 9:12,13,16 10:1 12:9 21:11,21,22 22:9,10,11 23:5 52:13	circuits 41:24	complain 43:20 46:9 55:15
CENTRE 2:8 62:6	ChildNet 2:13 5:24 6:5 7:10 11:2 16:5 17:18 21:11 24:7,9 27:21 28:16 34:13 41:19 48:1 58:9	CITY 2:8 62:6 Civil 51:16 claims 47:20 classes 56:17 clerical 7:23	complained 46:6,8 complaining 56:19
CEO 6:6 24:23 41:13	CHILDNET, INC 1:8 62:8	Clerk 62:15 client 6:23 11:9,12	complaints 38:15,18 39:21 45:23 46:5
certificate 52:15 53:18 60:1 61:1	ChildNet's 47:7	complete 13:11 33:13 58:14 61:11	
certificates 52:24 53:3	children 8:24 10:11,20 11:18,20	compliance 51:12,16	
certify 60:7 61:7,14 63:20	12:1,10,19 13:5,7,11		
CFO 6:8 29:13 35:1			
chain 52:8			
challenging 36:2			
CHANGE/ CORRECTION			

component	contractors	court	8:2, 6 30:5
20:2, 3	41:18	12:3 14:16	daughter
concern	contracts	16:4 62:15	9:4, 5
57:16	10:2 46:6	courtesy	Dawn 24:2
concerning	controller	15:17, 20	day 21:15
34:2 46:21	8:19	courts	36:18
50:10 53:21	controversy	CPA 54:18, 21	44:16, 21, 23
54:2, 10	57:10	CPR 52:12, 24	days 20:22
concerns	conversation	53:2, 3, 18	23:9 38:22
51:13	36:17, 18	creating 13:6	39:20 42:6
concluded	37:18, 19, 21	credit 32:4	day-to-day 23:20 50:14
59:9	38:3 42:17	35:21	DCF 9:21, 23
condescending	46:19, 23	Crescent	10:3
36:4, 6, 24	47:11 56:3	17:6, 23	DD806306
37:7, 11, 14	conversations	18:1, 3, 7	60:16
38:6 45:24	40:22	19:10, 16, 20,	December 7:11
46:13	convicted	22 20:5	11:4
conducting	27:20 34:6	criminal 28:6	decision 54:5
25:10	COO 6:7 25:23	33:10	55:7
conference	31:2 40:5	34:10, 16	Deena 22:6
37:6	coordinator	Crista	23:25
connected	29:4	43:9, 11	D-E-E-N-O 22:6
61:17	corporation	C-R-I-S-T-A	deep 23:4
consider	1:9 62:9	43:11	Defendant 1:10 2:9
36:21	correct 42:22	crystal 11:1	degree 7:7, 8
consolidating	52:25 63:23	cumbersome	delay 44:8, 12
17:16	correction	58:12, 18	45:16
consult	63:3	currently	51:6, 22, 25
57:6	corrections	20:20	delayed
consuming	63:23	————— D	45:1, 2 51:9
58:14	corrective	Dade 10:5	delays 38:24
contact	44:11	dare 36:20	department 9:17 10:1, 4
62:12	counsel 2:13	date 7:18	25:17 28:8
contain	61:15, 17	32:25	33:20 34:15
32:11	County 1:2	37:22, 25	56:8
contained	6:15 10:5	56:12	depends 21:19
32:12, 19	41:25 60:3	dated 53:7	
context	61:3	61:20	
37:17	couple 8:3	dates 7:10	
38:2 56:2	9:2		
contract	course 52:16		
10:3			
16:9, 11, 12			
18:11			
contracting			
17:25			

23:7, 9 27:23	19:1, 3	diversion	7:5
deposed 42:18	diligent	13:21	eight 15:2
deposition	15:9, 11, 14, 1	DJJ 9:24	Eisnor 7:22
1:21, 25	5 44:6	14:25 19:3	either 15:21
61:1, 9	Dipak 6:7	document	18:23 21:2
62:11, 13, 14,	direct 3:5	49:17 50:2	27:5 30:7
15 63:21	5:13 46:19	documentation	31:4
depositions	directly	22:10 54:14	electronic
39:10	51:10	documented	32:16, 18
describe	director 5:23	50:1, 4	33:9
37:10	6:2, 6, 9, 16, 2	documenting	electronicall
described	1 8:23 11:4	50:19	y 32:19
49:19	21:23 23:17	DOH 9:24	Electronics
DESCRIPTION	36:6, 25 37:2	domestic	8:4
4:3	46:6 49:3	20:12	eliminate
desk 43:24	52:14	done 11:21	59:3
detail 47:16	directors	13:10 20:13	eliminated
detailed	6:20 38:16	34:2 38:24	59:5
11:15	39:1 45:3	39:1, 19	else 14:6
determination	46:8	44:9, 15, 17, 2	42:20, 25
22:11	discuss 26:17	1	44:6, 25
determine	42:16 51:8	drivers 52:14	45:18 49:10
13:10 19:19	55:9	duly 5:11	59:4
determined	discussed	60:9	e-mail 50:21
51:19	42:18	during 24:7	51:3 52:8
determines	discussion	32:7 42:16	53:7, 17
19:16	7:16 28:12	56:20	56:18, 22, 23,
development	47:10	<hr/>	24, 25
7:2 21:24	50:6, 8, 9	<hr/>	57:16, 22, 24,
52:14	51:11 58:7	<hr/>	25 58:2
Diego 10:15	discussions	e) "... Any	e-mails 50:23
difference	27:13	63:2	54:20
18:1 58:22	48:3, 11	early 38:23	Emilio 6:7
different	58:19	39:18	employable
12:20 16:18	disqualifier	43:6, 17	28:10
23:16 32:3	33:24	easier 50:19	employed 8:17
41:17, 24	disqualifiers	EAST 2:8 62:6	34:16
46:2 58:15	28:7	Edify 48:14	employee 24:8
59:1 62:13	disrespectful	54:10, 15, 18	26:10 30:8
difficult	36:5, 7, 25	Education 7:7	61:15, 16
	37:8, 11, 14	educational	employees
	38:11, 18		

27:10 33:15, 19 employer 28:9 employment 40:12, 24 engage 48:13 engaged 47:3 ensure 13:4 entails 11:13 12:19 13:25 15:6 enter 32:16 entered 63:3 episode 13:6 Epstein 48:17 54:21, 23 Epstein's 54:19, 22 equipment 35:12 equivalent 52:13 ERRATA 63:1 ESQUIRE 2:2, 7 62:5, 25 Estate 7:22 evaluate 11:23 evaluating 54:3 evaluation 53:21 events 23:19 everything 50:19 58:22 exact 38:7 exactly 11:7 37:15 47:15	EXAMINATION 3:5 5:13 EXAMINATIONS 3:3 examined 5:11 example 43:4 44:10, 13 48:24 examples 38:4 except 51:25 excuse 17:21 44:24 55:20 executive 5:23 6:2, 6, 8, 9, 16 , 21 8:23 23:17 26:23 Exhibit 4:4, 5, 6, 7, 8 26:22, 25 34:21 49:12, 16 50:24 51:3 52:4, 5 53:19 Exhibits 4:9 53:23 expensive 23:2 58:20 experts 11:23 expired 52:17 EXPIRES 60:17 exposed 9:5 express 45:6 expressed 40:25 41:2 57:15, 21 extraordinary 14:2, 25 extreme 21:7, 9	F F.R.C.P 63:2 facilities 29:4, 12, 25 30:2 facility 11:20 16:5 factors 23:16 Families 33:21 family 12:11 13:19 28:9 FBI 28:4 FCIC 28:5 FDLE 32:18 federal 28:5 33:17 fee 48:8 fell 32:22 felon 34:6 felons 27:20 felony 27:11, 23, 24 28:7, 11 34:4 felt 26:10 35:20 38:6, 13 41:1 47:2 49:24 file 53:4 files 52:18, 19, 21, 22 53:5, 10, 16 filings 62:15 filled 21:12 33:2 final 25:4 financially	61:18 fingerprinting 32:16 fingerprints 33:9 first 5:11 9:23 13:13 24:7 30:18 36:8 49:23 five 6:13 Flora 8:19 Florida 1:2, 8, 15, 23, 24 2:4, 9 5:18 10:17, 20 15:21 28:5 60:2, 6, 7, 16 61:2, 7, 24 62:7, 8 Foods 8:19 foregoing 61:10 63:21 forgot 43:8, 9 form 28:19 30:13 55:4 57:12 63:2 for-profit 22:17 Fort 1:15 2:4, 9 62:7 forthcoming 25:3 forwarded 62:15 foster 14:19 15:8 16:10, 14, 16 19:1, 4 33:14, 19 41:21, 22
--	--	--	--

foundation 28:20 30:14 55:5	getting 9:7 10:22 38:24 39:1,19 42:8 44:8	16:11,13,17 17:5,6,7,17 18:2,4,6,12 20:6,15,17 21:1,2 47:7 48:13 54:10	heck 10:22 height 33:1 held 34:8 help 5:6 10:13 helped 10:16 Henderson 16:18,19,20 17:18,19,22
founded 9:3	gift 25:14,15,19, 20 26:7	groups 18:2 20:21,23 22:14	hereby 62:21 63:20
founder 8:23	gifts 30:25	guess 50:3	herein 63:23
Fourth 1:15 2:3	girls 17:7 18:2,4 20:4,5,6,8,1 5,17,24 21:5,8	H	herself 52:23
Freedom 17:22	given 14:16 29:25 63:4,21	hand 5:3 60:10	he's 6:8 10:9
friend 36:15,21,22	goal 14:10,12,15, 17	hand-pick 21:8	high 7:7,12 47:14,16 48:8
friends 25:8	God 5:6	happened 31:3,8	higher 6:16 13:23 21:17
front 36:6,25	GOMBERG 62:19	Harbor 17:10 20:25 21:1	highly 31:12
frustrated 40:13,19 57:2	gone 25:21 30:25 36:7	haven't 53:8	Hillsborough 42:1
frustration 38:25 39:20 45:5,6	gosh 21:14	having 5:10 27:2,5 46:23 47:3 50:18 55:6	hire 27:24 34:6,9
frustrations 40:18 45:14,15 56:8 57:21,23	governmental 17:11	head 18:20	hired 26:5,8 28:18,23 34:11
full 5:15	graduated 7:12	heads 25:2	hiring 27:20 34:7
function 29:19	Grant 28:18,22,25 29:3,15 30:7 34:8	health 9:17 10:2,4 11:23 16:19,20 19:14 47:7	histories 19:3
functions 58:17	Grant/ Washington 34:2	Healthcare 47:23	history 15:1 22:10 33:10
<hr/> G <hr/> G-A-M-E-L-I 37:5	GRAY 2:7 62:5	hear 5:21 24:19	home 9:2 12:15
Gamelin 37:2,5	Greenhough 34:25 35:5	heard 12:16 22:16 50:23	13:4,6,12 16:10,14
gathering 12:5	Greenhouse 29:13,14	hearing 12:4,12,13	17:7,17 18:2,4,6,12, 17
G-A-V 37:4	group	hearings 12:7 hears 12:13	
Gavlin 37:4			
generality 38:21			

20:6,15,17,1 9 21:1,2 33:7 38:23 39:13 40:1,4,9 41:21 homes 16:14 17:7,17 19:1,4 20:20 homesick 10:18,20 honestly 31:13 Hope 41:11,14 hoping 26:6 31:15 hospital 11:25 hours 12:16 house-parent 20:21 HR 38:19 39:3,7,19 44:9 45:16 52:18,22 53:4,5,10,16 HRS 9:21,23,25 human 39:4 Humana 47:17,21,22 husband 10:9,16	52:6 53:24 identify 12:1 I'll 52:3 I'm 5:21,23 7:1 8:22 19:8 20:6 23:19 24:8 28:25 34:5 36:20 39:4 46:11 51:21 52:11,18 54:7 55:22 56:1,7,11 imagine 34:11 40:11 immediate 24:11 immediately 25:22 31:1 implemented 49:4 inappropriate 24:20 56:18,20 incidence 38:14 incident 25:16 29:22,25 30:2 36:6 38:1 48:25 49:18,23,25 51:4 56:16 independent 14:2,7 25:18 individual 21:21 32:15 inform 26:21 information 12:5 25:3 32:12,17,20, 24 33:17,20	informed 25:25 26:1 in-home 12:23 13:3,15,17 41:19 IN-HOUSE 2:13 initially 11:18 12:9 13:1 inquiry 30:20 instead 39:7 insulted 36:20 insurance 47:7,10,13,1 8 48:16 53:22 54:3 intake 11:5,13,16,1 9,21,25 12:2 23:25 37:2 intended 35:16 interested 61:18 internal 26:12 34:13 interstate 15:17 inventory 35:11,12 investigate 26:15,17 investigating 51:22 investigation 25:11 26:2,6,24 30:12,16 32:1,6,7,22 35:5,15 47:4	investigation s 35:7 investigator 12:6 31:12 investiture 9:20 invoice 35:9 involved 20:11 23:19 29:18 30:19 32:3 49:6,7 53:1 involvement 54:3 57:9,11 isn't 50:3 Israel 24:10,14 issue 10:25 25:4 33:18,22 50:15 52:10 issues 9:8 19:13,14,15 20:10,11 26:10,12 27:7,9 28:9 35:10,13 47:16 50:18 it's 10:24 12:14 14:9,11,12,1 3 15:1,19,20 18:3 20:2,20,21,2 2,23 22:19 28:4 35:25 39:6 41:15 50:14 54:7,16 i-Vantage 58:10,11,12, 21,25
<hr/> I ICPC 15:17,20 idea 43:23 51:24 Identificatio n 27:1 34:22 49:13 50:25			

I've 56:10	25:18	Level	Lords 7:13
<hr/> J <hr/>	largely 19:10	28:2,3,14,16	lot 10:10,12
job 11:11	Larry 50:16	liaison 12:3	12:8 13:9
41:12	LAS 2:8 62:6	Liberta 24:2	20:10
Joey 54:20	last 6:3 11:9	licensed	23:12,15
joined 24:7	25:16 42:5	17:24 18:11	24:22 25:2
Joseph 48:17	43:8,9 53:8	licensing	32:19
judge 12:13	late 38:23	46:6	38:15,16,22,
judicial 1:1	39:15,17	lied 49:22	23,25 39:20
12:23 13:18	40:17	50:10	45:2 50:19
<hr/> K <hr/>	43:6,16	life 32:13,14	lots 45:14
Kamin 52:20	56:19	33:3,5,8,14	lower 21:16
53:13	Lauderdale	34:1 35:22	lumped 20:4
Kennedy 24:3	1:15 2:4,9	<hr/> L <hr/>	<hr/> M <hr/>
kid 33:5	62:7	Lila 46:5	magnitude
kids 10:22	law 27:17	Lilac	50:12
12:15 13:1	34:14 38:19	20:7,8,15	maintenance
16:7 19:10	laws 27:19	21:10 22:12	16:10,14
31:14	lead 41:16	lingered	29:20 35:13
knew	learn 50:17	14:14	41:22
27:3,6,15	least 11:16	L-I-S 22:24	man 19:20
31:11 38:19	12:11	list 45:4	manage 15:2
53:12	leave 38:23	listed 28:11	38:24 43:3
knowledge	39:18	little 42:3	44:6
49:3,4	43:6,16	44:16	management
known 52:2	Leigh 1:5	live 5:16	11:14
<hr/> L <hr/>	25:25 26:1,3	living	12:18,19,20
lack 44:5	31:5,9	5:16,20	13:22,23
45:16 46:13	36:4,19,20	14:2,7,10	15:13,16
Lady 7:13	38:2,15,19,2	25:18	24:3
Lakes 5:18	0,24 40:9,14	load 15:3	39:1,3,7
Land 48:18,19	44:17 45:8	Loffredo 2:7	41:15,20,21
language 38:5	46:24 49:22	5:19 28:19	48:2 54:10
laptop	58:19 62:8	30:13 34:18	manager 7:24
32:8,10,12,1	Leigh's 38:16	39:2,6,9	29:12
7	40:12	42:9,19 50:5	managers 13:7
large 1:24	lengthy 58:13	55:4,10,17,2	15:2
	less 19:24	2 57:12 59:7	manages 15:23
	20:10	62:5,25	managing
	letters 28:9	long 6:2 8:13	39:16,17
	33:18,22	24:13	manner

45:19,21	48:21	32:4,8	21:23
manual 49:1	mean 14:8	model	night 12:5
50:10	15:10 18:14	20:21,22	nine 17:15,16
March 1:16	21:13 37:9	models 41:17	18:10
11:8 59:10	46:11	modules 58:23	none 35:1
60:8,11	55:12,20	Monarch	non-for-
61:20	Meaning	18:10,12,19	profit 22:14,18
62:2,10	51:14,15	19:5,25	nonrelatives
63:22	52:20	21:17 22:12	12:10 15:8
marked	means 23:10	money 48:4,5	33:4,13,16
26:22,25	medical 9:8	monitor 13:20	nor 61:15,17
34:21	15:12,15	morning	Northeast 1:15 2:3
49:12,15	16:3	12:3,6 25:21	Northwest 5:17
50:24 51:2	meeting	Moss 25:25	Notary 1:24
52:5 53:24	57:19,20	26:14 27:13	60:6,16
marking 52:3	58:4	30:10,18	notes 61:12
maternity	memory 53:21	31:22	not-for-
21:2	54:2	36:7,19	profit 1:9
matter 62:11	mental 11:23	40:7,10,19,2	62:9
Maxine 53:7	16:19,20	0 41:3 45:7	nothing 5:6
may 11:8	19:14	47:2	notice 1:25
14:16,18,19	mention 54:20	mostly 20:20	62:10,13
19:12 21:6,9	mentioned	mother 10:21	notified 25:22,23
46:18 52:1	13:13	move 10:13	O
53:8 62:13	message 53:9	moved 10:8	OATH 60:1
maybe 8:3	meth 11:1	59:1	Object 28:19
10:13 53:20	Mexico 10:11	myself 36:22	30:13 55:4
McPhail 1:5	Miami 5:18	<hr/> N	57:12
26:9,14	7:9	national	objection 55:17,23
30:11,15,19	9:12,15,22	28:5,6	occur 37:21
31:10,17	Michelle 37:2	N-E 22:2	occurred 39:22
36:1,12 37:7	mind 54:8	necessarily	October 6:3
38:5 40:20	misconduct	58:5	
42:16,22	24:20	Neiko 7:4	
43:3 44:22	missed 38:22	21:24	
45:12,21	missing	N-E-I-K-O	
46:22 47:1	14:3,22	22:1,3	
49:5,8 50:9	15:11	Neither 29:9	
51:8 54:13	25:15,16	network 7:2	
55:9,16	26:11 31:1		
56:5,14,16			
57:7 62:8			
McPhail's			

offered 54:14	organizationa	14:14	personal
office 7:24	1 6:4	15:7, 8, 11	32:16, 19, 23,
13:20 31:3, 7	original	16:16 23:7	24 35:2 43:1
33:18 36:10	62:14	33:4, 14, 16	personally
38:21 39:13	originals	participating	31:13 60:8
40:15 62:12	53:16	57:18	persons
officer 63:3	Orlando 41:6	particular	14:3, 22 32:3
official	OTI 15:20	19:11	Peter 8:5, 6, 9
60:10	ours 18:17	20:8, 12 36:5	24:25 26:4, 7
Oh 13:16	Outside 25:9	44:4 46:4	27:14
21:14 42:22	oversee 23:20	parties	29:12, 14
51:23	oversight	61:15, 16	petitions
okay 6:14	12:24 13:18	pathology	12:24
8:13, 16, 20, 2	oxymoron	19:11	phone 36:18
5 11:4	14:12	pay 21:11	42:10
14:4, 20	<hr/> P <hr/>	paying 47:20	50:20, 23
15:25 22:4	P.A 1:14 2:3	payroll	58:2
24:6 32:9, 15	p.m 1:16 59:9	58:11, 15, 24	phonetic
33:25 34:24	PADs 12:24	59:2	46:5, 9 48:19
36:16, 23	page 3:3 4:3	people 34:7	physically
38:9 39:8, 12	62:17 63:3	38:25	19:2
41:7 42:4	PAGE/LINE	39:16, 17	pick 50:19
43:2, 13	63:5	43:4, 5, 15	picture 53:18
48:21 49:20	pages 61:11	44:7 45:4, 22	placed 13:11
53:7 58:3	Palm 6:9, 15	per	15:19, 21, 22
59:8	24:4	21:11, 15, 19	18:12, 16, 17
OLAS 2:8 62:6	paperwork	perceived	21:8
old 23:13	11:21	44:5	placement
one-day 51:25	Parekh 6:8	performance	11:5, 13, 16, 1
ones 21:7, 9	parent 33:8	38:19 58:12	9, 25
42:2, 3	41:22	period 30:6	12:1, 3, 11
on-site 11:23	parental	permanency	15:18 37:3
operation	14:1, 5	11:14	placements
23:20	parenting	13:24, 25	18:5
opinion 48:21	21:3	25:17	places 23:3, 6
opposed 15:3	parents 8:2	permanent	placing 33:7
18:5 19:20	11:19	14:10 18:5	Plaintiff 1:6
opted 47:21	13:2, 4, 8, 10	permission	2:4 5:10
Orange 41:25		42:8 52:22	Plaintiff's
organization		person 44:18	4:4, 5, 6, 7, 8,
41:15		51:15	9 26:25

34:21 49:12,16 50:24 52:4,5 53:23 plan 14:15 23:8 planned 14:10 please 5:3,15 7:6 11:3 16:25 21:25 42:12 43:4 62:10,12 plus 18:6 20:25 point 32:5 Pompano 8:19 Ponto 22:6 23:25 P-O-N-T-O 22:6 population 18:25 20:14 position 7:23 50:16 positions 34:7 possibility 47:12 pre-adoptive 15:8 33:14 pre-DCF 9:19 pregnant 21:3 premiums 47:14,16 presence 57:16 present 2:11 7:11 22:9 54:16 presenting	54:13 preservation 13:19 president 6:17,23 7:2 11:6,9,11 21:23 22:5 23:23 24:11 36:15 presidents 6:13,19,24 23:21,24 prevention 13:21 previously 51:2,5 price 21:13,19 primary 15:24 prints 32:18 prior 12:7 33:7 39:10 51:19 private 31:11 probable 12:15 probably 25:15 27:13 31:2,3 40:12 44:15 45:3 46:10 problems 26:5 Proceedings 59:9 processed 11:21 processing 58:25 product 54:14 professional 1:23 7:5	52:14 60:5,6,15 61:6,7,23,24 professionally 25:7 program 7:9 8:24 9:13 25:18 prohibit 34:4,7 promoted 11:6,8 prompted 25:4 protection 7:9 9:13,16 10:1 protective 12:21 provide 9:18 16:10,15 21:20 provider 17:5 20:12 22:9 providers 16:9,14,18 PROVIDES 63:2 providing 13:8 Public 1:24 60:6,16 pursuant 1:25 putting 13:4 <hr/> Q question 5:22 32:3 34:17 53:25 55:13,24 56:15 57:3 questions 59:8	quickly 12:9 quite 31:13 40:2,3 quote 49:22 <hr/> R rain 51:25 raining 44:24 Raise 5:2 raised 47:14 rather 12:11 Re 62:8 reached 31:5 reactive 18:13 19:7,9 reading 54:7 Real 7:22 really 14:9 15:20 37:25 53:2 reason 33:1 51:24 63:5 reasonable 62:14 reasons 12:14 63:4 recall 8:14,21 11:7 16:23 17:24 18:20 22:15 25:5 26:3,16 27:2,4,5,15 30:5,23 31:4,6,22,24 35:9,14 37:17,20,22, 25 38:2,7,8,10, 12 42:2 43:14 46:23 47:5,6,9,11,
--	---	--	---

15 48:1,3,4,6,9 ,15,18,20 49:9 50:11 51:10,11,12 52:1,2 54:12,21,24 55:1 56:2,6,10,12 ,23,24 57:5,8,25 58:7,16 recalled 55:6	42:22 Registered 1:22 60:5,15 61:6,23 regulation 34:14 regulations 27:17,19 Rein 49:21 relationship 34:25 35:2 58:8 relative 61:14,16 relatives 12:10 15:7 33:4,12,16 remain 24:13,14 remember 8:2,6 25:19 29:2 31:19,20 33:1 36:5 37:15 38:1,2,4 40:17 44:18 47:12,23 48:11,16 54:6,9,13 56:23 57:20,22 58:19,21 records 15:13,16 recruited 8:10,17 recruitment 16:16 41:22 rectify 29:23 refer 12:24 23:4 refresh 54:2 refreshes 53:21 refreshing 54:8 regarding	,16 29:17 47:2 61:8 reported 46:24 Reporter 1:23 5:2 60:6,15 61:7,23,24 REPORTER'S 61:1 requested 61:10 62:15 require 22:12 residential 16:5,10,13,1 7 17:5 resign 24:16 resources 39:5 response 37:16 44:8,12 45:17 responsibilit ies 50:13 responsivenes s 46:13 restrictive 12:11 results 28:7 resumé 7:21 retention 16:16 41:23 return 10:17 62:17 reunification 13:3 reunify 33:11 review 47:6,8 61:9 Rhonda 1:22	60:5,15 61:6,23 rights 14:1,5 51:16 ringing 50:23 risk 13:23 Robert 24:10 25:2 ROBINSON 2:7 62:5 roll 32:17 49:2 rolled 49:2 58:22,23,24 rollout 49:6 Rosenbloom 8:12,18 rude 36:5 rule 34:4,5,6,13, 14 63:2 rules 27:17,19 rumors 24:22 run 33:8 runaway 14:23 15:1 <hr/> S S-A 22:22,23 safe 11:20 12:14 25:20 26:11 safety 13:5 San 10:15 satisfied 48:2 Saturdays 12:17
---	---	---	---

saw 27:15	selection 54:4	SHEET 63:1	5:9,17 60:7
scale 21:17	send 22:10	She'll 59:7	61:9 62:4,23
scanned 33:3,6	50:22	shelter 12:7,12,13	63:25
scanning 32:13,14	sense 22:9	16:13	social 32:25
33:8 34:1	38:19	17:6,15	somebody 30:24 44:4
scans 33:15	sent 28:8	18:3,5	57:21
school 7:7,12	33:17 56:25	shelters 12:16,17	somehow 53:11
16:4	separate 63:3	16:11	someone 27:22
scope 31:25	September 11:9	Sheriff's 13:20 33:18	31:11
Scott 43:8	serve 18:25	she's 12:4	34:9,15
screen 28:17	service 16:15	23:25 40:9	Sometime 32:7
screening 11:24	services 6:23	41:6,8,13,18	Somewhat 54:5
15:7,14	9:18	42:1,2	sorry 5:21
27:6,9 28:3	11:6,9,12,14	short 8:1	7:1 8:22
33:13	12:22,23	30:2,5	19:8 20:6
screenings 28:2,15	13:4 15:5,6	showing 52:15	34:5 39:4
SCSC 28:5	16:1 21:19	Shulitz 8:12,18	52:11,18
seafood 8:7	22:5 23:24	sibling 20:23	sos 17:7,9
10:10	24:1,4,12	siblings 20:20	20:18,19
Seafoods 8:5,6	29:23,24	21:2	s-o-s 17:9
Seafood's 8:9	30:1,3,4	sic 22:6 32:4	speak 36:19
seal 60:10	seven 10:18	sign 62:13,14,16	42:19 49:8
search 15:9,12,14,1	SEVENTEENTH 1:1	signature 62:11,16,21	specialist 11:25
5	several 8:11	Silmar 8:3	specific 48:10,11
seat 52:11,12,25	sex 20:12	SILVIA 1:21	56:10
53:2	sexual 15:1	simply 59:3	specifics 46:15
second 31:23	sexually 18:12,15,16	sit 45:3	Spell 8:25
security 32:25	19:5,25	Site 48:18,19	16:25 21:25
seeing 27:4	share 45:5	situation 35:22	split 9:24,25
seen 26:24	shared 56:7,11	six 18:21,22	spoke 42:5
27:2,5	sharing 40:17	Smith-Torres 1:21	51:4
	Shea 7:4	3:4	stabilize 11:22 13:5
	21:24		staff 8:10
	S-H-E-A 22:3		12:6 27:24

45:15,16 46:2 58:11 standard 21:13 stands 16:23 start 28:14 30:15 started 7:23 8:22 9:4 11:4 starting 10:12 state 1:24 18:18 41:17,20 60:2,7,16 61:2 stated 49:5 statement 56:24 63:3 statements 37:16 states 15:19 state's 15:22 stay 23:5 stayed 9:2 10:20 stealing 31:14,16 stenographic 61:12 stenographica lly 61:8 Steve 28:18,22 29:2,11,12,1 4 stole 26:7 straight 31:2 Street 1:15	2:3 structure 6:4 subcontract 41:21 subcontracted 9:17 41:16 subcontractin g 9:22 submitted 32:18 subsequently 59:1 substance 8:24 9:5 19:14 20:11 63:2 suggested 26:1 48:17 58:16 summary 26:23 Sundays 12:17 supervised 36:8 supervision 12:21 15:17,20 supervisor 24:11 25:17 49:6 support 11:6,14 15:5,6 16:1 22:5 23:24,25 29:22,23,24 30:1,3,4 supposed 18:3 24:21 44:17 Supposedly 38:22 sure 42:13	46:11 56:1,7,11 SUTTER 2:13 swear 5:4 switched 22:16 sworn 5:11 60:9 Sylvia 3:4 5:9,17 53:8 60:7 61:9 62:4,23 63:25 system 14:14 23:14 58:11 59:2	T Taking 1:25 talent 39:1,2,6 talk 11:22 26:4 36:9,10,14,2 1 42:25 46:21 talking 29:1 31:7 38:2 45:25 48:7 Target 25:20 tasks 13:8,10 14:15 23:8 team 7:9 9:13,16 10:1 48:2 teen 21:5 teens 21:3 temporary 18:4 ten 7:22	tend 21:7 Teresa 24:3 terminated 24:16 25:4 39:23 51:16 56:5,6,7 57:7 terminating 14:5 termination 14:1 44:14 51:6,9,18,20 terminations 44:12 testified 5:11 30:14 testify 55:5 testimony 5:4 12:13 Thank 59:6 that's 10:25 11:20 14:15 16:1,22 26:8 34:13,14 35:14 40:5 41:1,16 42:21,24 53:17 57:3 58:20 themselves 10:12 therapeutic 20:2 there's 6:20 12:8,15,20 13:9,17 18:21 19:12 22:8 23:15 28:10 33:9,24 41:17 42:2 54:20 56:16
--	---	--	--	---

THEREUPON	transport	32:2	vice
5:1, 8	16:3	undertake	6:13, 17, 19, 2
they're 11:19	transportatio	32:1	3, 24 7:2
14:16	n 15:12, 15	unfortunately	11:6, 8, 11
15:21, 24	16:2 29:19	14:13	21:23 22:5
16:15	49:1	ungovernable	23:21, 23, 24
17:14, 24	tried 11:21	23:15	24:11 36:15
18:11, 15, 17	trouble	unit 13:19, 25	Village
19:2, 3	10:12, 23	14:1, 2, 3, 22,	17:7, 9
21:7, 20	33:5	24	20:18, 19
22:17 27:22	truant 19:2	15:2, 12, 13, 2	visits 16:4, 8
43:25 44:2	true 61:11	3 16:1, 2	Vista
THOMAS 2:7	63:23	United	47:20, 21
62:5, 25	truly 62:18	41:11, 14	voluntary
throughout	truth 5:5, 6	47:23	12:21, 22
41:17	48:22, 23	units 13:3	13:18
Tiffany 43:8	truthful	University	vote 54:9, 12
Tijuana 10:24	49:24	7:8	55:6
till 9:7	try 11:22	9:11, 15, 22	voted 55:3
today 52:1, 2	13:5	Unless 34:9	vs 1:7
tone 37:16	trying 12:10	upon 63:3	<hr/> W
38:16	45:24 58:10	upper 54:9	waive
45:19, 21	turning	upset 56:21	62:11, 16, 21
46:14	23:10, 11, 13,	USF 54:15	waived
top 18:20	14	USI 47:24	34:10, 12
towards	type 49:1	48:2, 7, 13	walk 43:18
21:16, 17	types 13:17	54:11	Walked 31:2
40:12, 24	typical 23:5	usually 14:13	wall 35:10
TPR 14:1	<hr/> U	<hr/> V	Walmart 25:19
trafficking	ultimately	valid 52:17	wasn't 40:16
20:12	53:5 54:5	varies 21:14	43:5 52:12
trained 20:13	UltiPro 58:20	vehicle	55:7
training	Um 36:2	29:18, 20	Wayne 25:10
52:11, 12, 19,	umbrella 9:25	35:13	26:2, 5, 8, 18
21, 23, 25	understand	veracity	31:9 35:5
53:2	31:25 50:12	48:22	47:3
56:17, 19, 20	55:13	versus 48:14	Wednesday
transcript	understanding	via 62:24	1:16
61:10, 11			week 23:13
62:24 63:21			
transfer 16:7			

weeks 23:14 44:15,16	work 8:5,18 9:4,9 10:7 13:3,7 24:9 25:9 27:20 28:16 29:10 38:22		
weight 33:1			
well-being 13:5			
we're 12:9 17:16,24 33:11 48:19	worked 7:8,10,21,22 8:1,6,8,11 9:6 29:3,9,11,12 38:22 39:13		
whatsoever 46:15			
whether 19:16,19 23:7 28:9 31:22 33:22 34:1 35:19 47:20 48:1 51:15,21 52:15,16 57:7 58:7	working 14:14 20:13 23:7 24:14 39:25 40:4,9 41:8		
Whoever 44:3	works 13:19		
whole 5:5	worry 50:13		
whom 29:10 56:22 57:24	writing 46:17,18 49:21		
Who's 7:3	<hr/> Y <hr/>		
whose 32:10	yet 30:20 43:20		
WILLIAM 2:2 62:25	young 19:19		
Williams 28:18,22 29:8,14,17 30:7 34:2,8	yours 62:18		
wish 7:21 50:1 62:16	youth 24:4		
witness 5:7,10,21 27:2 34:20 39:4 40:22 43:21 53:25 55:12,20,25 60:10 63:3,4			
women 8:24			